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Jennifer C. Hayes (197252)  
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6 Attorneys for Kyle Everett,  
Chapter 7 Trustee  
7

8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 In re  
12 BENJA INCORPORATED,  
13 Debtor.  
14  
15  
16  
17  
18  
19

Case No. 20-30819-DM  
Chapter 7

**DECLARATION OF JENNIFER C.  
HAYES IN SUPPORT OF SECOND  
INTERIM FEE APPLICATION FOR  
COMPENSATION AND EXPENSE  
REIMBURSEMENT BY COUNSEL FOR  
THE TRUSTEE**

Date: October 6, 2023  
Time: 10:00 a.m.  
Place: Tele/videoconference

20 I, Jennifer C. Hayes, declare as follows:

21 1. Finestone Hayes LLP (the "Firm") is the Trustee's court-appointed counsel in the  
22 above-captioned bankruptcy case. I am a partner at the Firm. I make this declaration of my own  
23 personal knowledge and could and would testify competently thereto if called upon to do so. As  
24 to any matters stated on information and belief, I believe the information to be true and correct. I  
25 make this Declaration in support of the Firm's *Second Interim Fee Application of Counsel for the*  
26 *Chapter 7 Trustee* (the "Fee Application").

27 2. Together with Stephen D. Finestone, I am one of the two attorneys principally  
28

DECLARATION OF JENNIFER C. HAYES IN SUPPORT OF SECOND INTERIM FEE  
APPLICATION OF COUNSEL FOR THE CHAPTER 7 TRUSTEE

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1 responsible for the Firm's representation of the Trustee in this case.

2 3. I have read the Fee Application filed concurrently herewith. To the best of my  
3 knowledge and belief, formed after reasonable inquiry, the statements contained therein are true.

4 4. No payments have been made or promised to the Firm for services rendered in  
5 connection with the case.

6 5. Prior to filing this Application, I emailed a copy of it to Kyle Everett, the Chapter  
7 7 Trustee in this case, and advised him of the Trustee's obligations under the Court's Guidelines  
8 for Compensation and Expense Reimbursement, as well as the right to discuss any matters with  
9 me, the Office of the United States Trustee, or the Court.

10 6. To the best of my knowledge, information, and belief, the compensation and  
11 expense reimbursement sought in the Fee Application are in conformity with the Guidelines and  
12 Expense Reimbursement for Professionals and Trustees for the United States Bankruptcy Court  
13 for the Northern District of California, except as otherwise stated in the Fee Application. Certain  
14 of the billing categories exceed \$20,000; however, I am informed and believe that it would be  
15 impractical to reduce them to under \$20,000, for the reasons stated in the Fee Application. Fees  
16 for drafting the Fee Application do not exceed five percent of the amount of the Fee Application.

17 7. The compensation and expense reimbursement requested are billed at rates no less  
18 favorable than those customarily billed by the Firm. The Firm does not charge for word  
19 processing.

20 8. Attached as **Exhibits A and B** are authentic copies of the Firm's time summaries,  
21 which were prepared and maintained in the ordinary course of business, and which accurately  
22 reflects the Firm's fees and expenses for this case.

23 I declare under penalty of perjury that the above statements are true and that if called as a  
24 witness I could and would testify to their truthfulness. This declaration is executed on September  
25 15, 2023, in Contra Costa County, California.

26 Jennifer C. Hayes  
27 Jennifer C. Hayes  
28

DECLARATION OF JENNIFER C. HAYES IN SUPPORT OF SECOND INTERIM FEE  
APPLICATION OF COUNSEL FOR THE CHAPTER 7 TRUSTEE

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# Exhibit A

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Finestone Hayes LLP  
Pre-bill Worksheet

Page 1

Nickname Everett.Benja | Eve001  
Full Name Kyle Everett  
Address 150 Post Street  
Suite 400  
San Francisco, CA 94108

Phone 1  
Phone 3  
In Ref To In re Benja Incorporated  
Case No. 20-30819

Phone 2  
Phone 4

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
Activity: 2004					
7/20/2021 44395	S. Finestone 2004 Review email and draft 2004 application from counsel for Peters and emails with client re same.	525.00	0.40	210.00	Billable
7/21/2021 44414	S. Finestone 2004 Follow up email with counsel for Peters regarding form of 2004 application.	525.00	0.10	52.50	Billable
7/22/2021 44425	S. Finestone 2004 Discussion with Kyle Everett regarding 2004 examination of Chapin in connect to claims against Peters.	525.00	0.20	105.00	Billable
8/4/2021 44841	S. Finestone 2004 Emails with Chapin's counsel re coordination of 2004 exam by Peters	525.00	0.20	105.00	Billable
8/9/2021 44734	S. Finestone 2004 Tel call with Kyle Everett re conduct of Chapin 2004	525.00	0.20	105.00	Billable
8/10/2021 44719	S. Finestone 2004 Emails re Chapin 2004	525.00	0.10	52.50	Billable
8/11/2021 44730	S. Finestone 2004 Tel call with Chapin's counsel re 2004 and related issues.	525.00	0.20	105.00	Billable
8/20/2021 45030	S. Finestone 2004 Further emails re Chapin 2004 exam	525.00	0.20	105.00	Billable
8/25/2021 45104	S. Finestone 2004 Emails with counsel for Peters and Chapin re 2004 and emails with client re same.	525.00	0.20	105.00	Billable

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Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/27/2021 45139	S. Finestone 2004 Tel call and email with Chapin counsel re various matters connected to 2004 by Peters.	525.00	0.30	157.50	Billable
9/2/2021 45365	S. Finestone 2004 Tel call with client regarding production of documents to counsel for St James and related matters; emails with counsel for Chapin re same.	525.00	0.40	210.00	Billable
9/3/2021 45385	S. Finestone 2004 Tel call with counsel for Peters re document production and related matters.	525.00	0.20	105.00	Billable
9/9/2021 45483	S. Finestone 2004 Conf call with client and counsel for Peters (.2); review client docs prior to production and email with counsel for Chapin re same (1.4)	525.00	1.60	840.00	Billable
9/10/2021 45507	S. Finestone 2004 Tel call with Kyle Everett re document production and Chapin computer questions.	525.00	0.20	105.00	Billable
9/10/2021 45501	S. Finestone 2004 Complete initial document review and produce documents to counsel for Peters and follow up emails re same.	525.00	1.60	840.00	Billable
9/15/2021 45578	S. Finestone 2004 Numerous emails with counsel for Peters and Chapin re upcoming examination (.3); continue with document review for production of documents to Peters' counsel and produce same.(1.8)	525.00	2.10	1,102.50	Billable
9/21/2021 45678	S. Finestone 2004 Emails with counsel for Chapin re upcoming examination	525.00	0.10	52.50	Billable
9/22/2021 45707	S. Finestone 2004 Prepare for Chapin 2004 exam	525.00	0.40	210.00	Billable
9/22/2021 45703	S. Finestone 2004 Zoom meeting with counsel for Chapin and Kyle Everett re upcoming examination.	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/23/2021 45732	S. Finestone 2004 Prepare for and attend 2004 examination; tel calls iwht counsel for Chapin and with client	525.00	3.10	1,627.50	Billable
10/4/2021 45938	S. Finestone 2004 Review recently received bank statements from Chapin and emails with his counsel re same.	525.00	0.40	210.00	Billable
12/27/2021 47532	S. Finestone 2004 Discussions and emails regarding 2004 examination of Andrew Chapin and related matters.	525.00	0.40	210.00	Billable
Total: 2004			13.10		\$6,877.50
<u>Activity: 2004 - Buerck</u>					
1/3/2021 40204	S. Finestone 2004 - Buerck Work on 2004 applications for Goode, American Taco Corp and former lender	560.00	0.40	224.00	Billable
1/4/2021 40225	S. Finestone 2004 - Buerck Continue putting together applications and emails with client re same.	560.00	0.50	280.00	Billable
3/2/2021 41659	S. Finestone 2004 - Buerck Tel calls and emails with R. Michelson re document production and witness appearance by Buerck and Taco Corp of America and coordinate same with counsel for creditors	560.00	0.50	280.00	Billable
3/9/2021 41838	S. Finestone 2004 - Buerck Emails with counsel for Buerck and begin review of proposed protective order	560.00	0.50	280.00	Billable
3/11/2021 41941	S. Finestone 2004 - Buerck Tel call with Kyle Everett re protective order and related issues for examination of Buerck/Taco Corp	560.00	0.30	168.00	Billable
3/11/2021 41959	S. Finestone 2004 - Buerck Review and edit proposed stipulation for protective order and order re same in connection with Buerck production of documents.	560.00	1.60	896.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/17/2021 42079	S. Finestone 2004 - Buerck Emails with R. Michelson regarding protective order	560.00	0.20	112.00	Billable
3/18/2021 42085	S. Finestone 2004 - Buerck Follow up with client re MHC and Buerck examinations	560.00	0.20	112.00	Billable
3/19/2021 42094	S. Finestone 2004 - Buerck Further emails with Michelson re Buerck protective order nad production of documents	560.00	0.20	112.00	Billable
3/22/2021 42102	S. Finestone 2004 - Buerck Tel call with counsel for Buerck re protective order and discuss same with client.	560.00	0.60	336.00	Billable
3/29/2021 42222	S. Finestone 2004 - Buerck Meet and confer with counsel for Buerck re protective order and related issues.	560.00	0.40	224.00	Billable
4/1/2021 42304	S. Finestone 2004 - Buerck Review latest draft of protective order with Buerck; email client re same	560.00	0.40	224.00	Billable
4/13/2021 42678	Amy Leitner 2004 - Buerck Review and prepare documents for Buerck 2004 exam.	300.00	2.70	810.00	Billable
4/15/2021 42600	S. Finestone 2004 - Buerck Further emails with counsel for Buerck re protective order	560.00	0.10	56.00	Billable
4/16/2021 42634	S. Finestone 2004 - Buerck Review latest form of protective order stip from counsel for Buerck and email her re same.	560.00	0.30	168.00	Billable
4/21/2021 42696	S. Finestone 2004 - Buerck Emails with counsel for Buerck re filing stipulation for protective order	560.00	0.10	56.00	Billable
4/29/2021 42943	Amy Leitner 2004 - Buerck Review and analysis of relevant discovery documents in preparation for 2004 exam	300.00	2.50	750.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/30/2021 42832	S. Finestone 2004 - Buerck Initial review of documents from Buerck and review objections and privilege log.	560.00	1.00	560.00	Billable
5/5/2021 43059	Amy Leitner 2004 - Buerck Continue to analyze documents provided by SEC in preparation for 2004 exam	300.00	5.60	1,680.00	Billable
5/7/2021 43090	Amy Leitner 2004 - Buerck Continue to analyze documents provided by SEC in preparation for 2004 exam	300.00	3.60	1,080.00	Billable
5/10/2021 43258	Amy Leitner 2004 - Buerck Continue to analyze documents provided by SEC in preparation for 2004 exam	300.00	6.10	1,830.00	Billable
5/19/2021 43463	S. Finestone 2004 - Buerck Initial review of recent batch of SEC documents re Buerck	560.00	0.60	336.00	Billable
5/21/2021 43479	S. Finestone 2004 - Buerck Emails with counsel for Chapin re meeting to review matters; emails with K. Everett re same.	560.00	0.30	168.00	Billable
5/27/2021 43321	S. Finestone 2004 - Buerck Continue review of documents from Buerck and discuss same with Mr. Everett.	560.00	1.10	616.00	Billable
Total: 2004 - Buerck			29.80		\$11,358.00
<u>Activity: 2004-Goode</u>					
1/27/2021 40809	S. Finestone 2004-Goode Emails with counsel for Goode re arranging examination	560.00	0.20	112.00	Billable
2/12/2021 41264	S. Finestone 2004-Goode Tel call with counsel for Goode to update document production and coordinate appearance	560.00	0.30	168.00	Billable
2/22/2021 41471	S. Finestone 2004-Goode Emails with counsel for Goode re document production and initial review of same.	560.00	0.40	224.00	Billable



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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/23/2021 41496	S. Finestone 2004-Goode Emails with counsel for Goode and creditors re scheduling of examination	560.00	0.20	112.00	Billable
2/25/2021 41509	S. Finestone 2004-Goode Initial review of documents from Goode for 2004 examination	560.00	1.00	560.00	Billable
2/26/2021 41616	S. Finestone 2004-Goode Emails with creditors' counsel re document production and confirm date of examination	560.00	0.20	112.00	Billable
3/1/2021 41644	S. Finestone 2004-Goode Prep for Goode examination and tel calls and emails with Kyle Everett re same.	560.00	2.60	1,456.00	Billable
3/2/2021 41682	S. Finestone 2004-Goode Continue document review and preparation for Goode 2004 examination	560.00	3.60	2,016.00	Billable
3/3/2021 41685	S. Finestone 2004-Goode Further preparation for Goode Rule 2004 examination.	560.00	2.10	1,176.00	Billable
3/4/2021 41728	S. Finestone 2004-Goode Zoom conf with Kyle Everett and Erevshare - Michael Stern to discuss Goode 2004 (1.0); tel call with Goode's counsel (.2); tel calls with Kyle Everett re Goode examination (.5); continue document review and preparation for examination (3.1)	560.00	4.80	2,688.00	Billable
3/5/2021 41736	S. Finestone 2004-Goode Final preparation for 2004 exam of Thomas Goode (1.); take examination of Thomas Goode (6.0) follow up calls with client; emails with counsel for ERevshare and counsel for Goode re follow up requests (.7).	560.00	7.70	4,312.00	Billable
4/30/2021 42952	Amy Leitner 2004-Goode Assist with analysis and preparation of exhibits for 2004 exam	300.00	1.90	570.00	Billable
Total: 2004-Goode			25.00		\$13,506.00
Activity: 2004-MHC					
1/6/2021 40276	S. Finestone 2004-MHC Further work on 2004 applications and emails with client and counsel for Busey Bank re same.	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/8/2021 40289	S. Finestone 2004-MHC Draft Rule 2004 app for MHC and emails with counsel for Busey re same.	560.00	0.50	280.00	Billable
1/18/2021 40563	S. Finestone 2004-MHC Modfiy 4 applications and draft orders to allow for appointment of Chapter 7 trustee and finalize same.	560.00	0.70	392.00	Billable
1/21/2021 40664	S. Finestone 2004-MHC Review court communication re need to revise orders on Rule 2004 applications; revise same.	560.00	0.30	168.00	Billable
2/11/2021 41196	S. Finestone 2004-MHC Tel call with counsel for MHC re 2004 order, document production and related matters and email to client re same.	560.00	0.50	280.00	Billable
2/12/2021 41265	S. Finestone 2004-MHC Tel call with counsel for MHC to confirm acceptance of subpoena, discuss case and timing for production and examination; email to K. Everett re same	560.00	0.40	224.00	Billable
2/18/2021 41420	S. Finestone 2004-MHC Emails with counsel for MHC, with counsel for UMB, with E-Revshare and client re 2004 updates; tel call with counsel for Buerck	560.00	1.00	560.00	Billable
2/19/2021 41428	S. Finestone 2004-MHC Further emails with counsel for MHC re document production and update ERevshare re same	560.00	0.30	168.00	Billable
2/22/2021 41470	S. Finestone 2004-MHC Emails with related creditor counsel and client re scheduling of 2004	560.00	0.30	168.00	Billable
2/25/2021 41508	S. Finestone 2004-MHC Emails with counsel for MHC	560.00	0.20	112.00	Billable
3/24/2021 42183	S. Finestone 2004-MHC Continue review of MHC document production and preparation for Rule 2004 examination	560.00	3.60	2,016.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/25/2021 42182	S. Finestone 2004-MHC Continue review of MHC document production and preparation for Rule 2004 examination	560.00	3.30	1,848.00	Billable
3/26/2021 42181	S. Finestone 2004-MHC Continue review of MHC document production and preparation for Rule 2004 examination	560.00	0.60	336.00	Billable
3/27/2021 42215	S. Finestone 2004-MHC Continue review of MHC document production and preparation for examination	560.00	3.70	2,072.00	Billable
3/28/2021 42218	S. Finestone 2004-MHC Further prep for MHC 2004 and emails with MHC's counsel.	560.00	0.80	448.00	Billable
3/30/2021 42245	Jennifer Hayes 2004-MHC Telephone call with S. Finestone re discovery issues (.1)	525.00	0.10	52.50	Billable
3/30/2021 42228	S. Finestone 2004-MHC Tel call with counsel for MHC regarding upcoming 2004 and emails with creditors re same.	560.00	0.50	280.00	Billable
3/30/2021 42229	S. Finestone 2004-MHC Conf call with client regarding MHC 2004 exam and prepare for same.	560.00	1.10	616.00	Billable
3/31/2021 42299	S. Finestone 2004-MHC Conf call with client and creditor constituencies; prepare for MHC 2004	560.00	4.20	2,352.00	Billable
4/1/2021 42307	S. Finestone 2004-MHC Final preparation for and take 2004 exam of MHC Financial; post exam call with client and counsel for creditors	560.00	5.60	3,136.00	Billable
4/6/2021 42381	S. Finestone 2004-MHC Zoom call with EPowerment/ERevshare to recap MHC examination and theories of recovery	560.00	0.50	280.00	Billable
4/7/2021 42434	S. Finestone 2004-MHC Emails with counsel for MHC	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/8/2021 42462	S. Finestone 2004-MHC Emails with counsel for MHC re various matters.	560.00	0.20	112.00	Billable
5/1/2021 42955	Amy Leitner 2004-MHC Work on preparation of documents for 2004 examination	300.00	2.60	780.00	Billable
12/26/2021 47540	Jennifer Hayes 2004-MHC Emails from and to B. Reed regarding 2004 examination for A. Chapin (.1)	525.00	0.10	52.50	Billable
12/27/2021 47602	Jennifer Hayes 2004-MHC Telephone call with S. Finestone regarding A. Chapin deposition and emails to and from S. Finestone re A. Chapin' criminal counsel (.1); email to R. Pollock regarding scheduling a 2004 examination (.1); review email from R. Pollock re same and email to B. Reed re same (.1); analysis re 2004/7030 issue (.1); emails to and from S. Finestone re same (.1); email to B. Reed re same (.1); telephone call with S. Finestone regarding Chapin 2004 exam (.1); email to R. Pollock re same (.1)	525.00	0.80	420.00	Billable
Total: 2004-MHC			32.50		\$17,489.00
Activity: 341					
12/10/2020 39735	S. Finestone 341 Attend continued meeting of creditors	525.00	0.30	157.50	Billable
1/12/2021 40385	S. Finestone 341 Attend continued 341 and post hearing conversation with Jared Day re conversion of case.	525.00	0.50	262.50	Billable
2/23/2021 41493	S. Finestone 341 Attend 341 for Chapter 7 case	525.00	0.40	210.00	Billable
Total: 341			1.20		\$630.00
Activity: Admin					
11/9/2020 39006	Jennifer Hayes Admin Emails from and to S. Finestone re initial case issues and employment application (.1)	525.00	0.10	52.50	Billable
11/13/2020 39064	Jennifer Hayes Admin Research re bond issue and telephone call with S. Finestone re same (.1)	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/18/2020 39199	S. Finestone Admin Review of Statement of Financial Affairs and Schedules filed by debtor; emails with K. Everett	525.00	0.50	262.50	Billable
11/23/2020 39369	Jennifer Hayes Admin Review criminal complaint (.2); emails from and to S. Finestone re same (.1)	525.00	0.30	157.50	Billable
11/24/2020 39350	S. Finestone Admin Attend initial meeting of creditors	525.00	0.40	210.00	Billable
11/25/2020 39414	S. Finestone Admin Tel call with Kyle Everett re potential filings and update on discussions	525.00	0.30	157.50	Billable
11/25/2020 39415	S. Finestone Admin Work on preparation of creditor matrix per clerk's request for same and direction from client	525.00	1.00	525.00	Billable
11/26/2020 39422	S. Finestone Admin Complete creditor matrix and research re same and draft statement for filing; email with Kyle Everett re same.	525.00	1.10	577.50	Billable
11/27/2020 39426	S. Finestone Admin Review info from client and amend creditor matrix and related filings	525.00	1.00	525.00	Billable
12/7/2020 39627	S. Finestone Admin Draft statement regarding designation of responsible individual (.7); discuss same with Mr. Everett (.2), edit and finalize same (.3).	525.00	1.20	630.00	Billable
12/9/2020 39711	S. Finestone Admin Draft status conference statement and email to client	525.00	1.00	525.00	Billable
12/16/2020 39871	S. Finestone Admin Discussion with Kyle Everett regarding status conference and other matters.	525.00	0.30	157.50	Billable
12/17/2020 39886	S. Finestone Admin Attend status conf	525.00	0.20	105.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/18/2020 39939	S. Finestone Admin Discussions with client re conversion and other pending issues.	525.00	0.20	105.00	Billable
1/19/2021 40568	S. Finestone Admin Draft letters to Gusto and VRBO re tracing of funds and access to debtor info (.8); emails with J. Zageski re same. (.3)	525.00	1.10	577.50	Billable
1/20/2021 40718	S. Finestone Admin Emails with client re December operating report and review same prior to filing	525.00	0.30	157.50	Billable
2/2/2021 40990	Jennifer Hayes Admin Review and respond to email from S. Finestone re conversion issue (.1)	525.00	0.10	52.50	Billable
2/11/2021 41197	S. Finestone Admin Conf call with client and Gusto re turnover of records and access to system (.4); follow up call and email with Gusto counsel and client re same. (.3)	525.00	0.70	367.50	Billable
7/5/2021 44195	Ryan Witthans Admin Review case memo and settlement letters; emails with team re upcoming complaints and/or settlements (0.4).	350.00	0.40	140.00	Billable
7/9/2021 44236	Ryan Witthans Admin Emails with team re case assignments (0.1).	350.00	0.10	35.00	Billable
7/30/2021 44632	S. Finestone Admin Discussion with Kyle re Chapin computer and other matters.	525.00	0.20	105.00	Billable
8/12/2021 44729	S. Finestone Admin Emails with counsel for Chapin and counsel for MHC re 2004 and other issues.	525.00	0.20	105.00	Billable
8/13/2021 44811	S. Finestone Admin Emails with counsel for Chapin re computer issues and other matters.	525.00	0.20	105.00	Billable
10/13/2021 46141	S. Finestone Admin Conf call with Kyle Everett and Joe Zagajeski re payroll issues and emails with Chapin re same.	525.00	0.40	210.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/16/2021 46178	S. Finestone Admin Review and finalize letter to Gusto in-house counsel re problems with information needed for tax reporting.	525.00	0.40	210.00	Billable
10/23/2021 46286	S. Finestone Admin Review letter from Gusto re handling of final payroll and related issues.	525.00	0.40	210.00	Billable
10/24/2021 46285	S. Finestone Admin Emails with counsel for Chapin re documents and other issues.	525.00	0.20	105.00	Billable
12/30/2021 47618	S. Finestone Admin Emails re Chapin related matters and discuss same with J. Hayes	525.00	0.70	367.50	Billable
1/6/2022 47810	Ryan Witthans Admin Phone call with J. Hayes re case developments and upcoming employment motion (0.1).	350.00	0.10	35.00	Billable
1/6/2022 47797	S. Finestone Admin Emails with creditor re motion for approval of Buerck settlement; emails with AUSA re release of plea agreement	525.00	0.40	210.00	Billable
1/6/2022 48051	Ryan Witthans Admin Phone call with J. Hayes re case developments and upcoming employment motion (0.1).	350.00	0.10	35.00	Billable
2/3/2022 48378	Jennifer Hayes Admin Emails from and to R. Witthans re errata to employment application for UnitedLex (.1)	525.00	0.10	52.50	Billable
2/4/2022 48364	Jennifer Hayes Admin Follow up email to K. Everett re W-2 for Buerck and review and respond to email from J. Zagajeski re same (.1); email to R. Newsome re 9019 order (.1); review and respond to J. Zagajeski re estate's W9 and review settlement agreement to calculate payment deadline (.1); email to R. Michelson re same (.1); follow up email to K. Everett re same (.1)	525.00	0.50	262.50	Billable
3/15/2022 49341	Ryan Witthans Admin Review case materials re upcoming adversary proceeding status conference (0.1).	385.00	0.10	38.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/15/2022 48991	Jennifer Hayes Admin Emails from and to K. Everett re Busey Bank claim and scope of lien (.1)	560.00	0.10	56.00	Billable
3/17/2022 49099	Jennifer Hayes Admin Review email from M. Knutsen re return of computers and email to J. Zagajeski and K. Everett re same (.1); review email from K. Everett re same and email to M. Knutsen re same (.1); further emails re same (.1)	560.00	0.30	168.00	Billable
4/11/2022 49568	Jennifer Hayes Admin Review email from UnitedLex re invoice and review backup for same (.1); email to K. Everett re same (.1)	560.00	0.20	112.00	Billable
4/14/2022 49654	Ryan Witthans Admin Phone calls with S. Finestone re tomorrow's status conference; review status conference statement and outline comments for tomorrow's hearing (0.4).	385.00	0.40	154.00	Billable
4/15/2022 49657	Ryan Witthans Admin Prepare for status conference and discovery dispute hearing (1.5). Appear at hearing; follow-up emails with team re same (0.7).	385.00	2.20	847.00	Billable
5/5/2022 50083	Jennifer Hayes Admin Review United Lex current bill and emails to and from R. Witthans re same (.1)	560.00	0.10	56.00	Billable
6/6/2022 50655	Jennifer Hayes Admin Review email from UnitedLex re current invoice and email to R. Witthans re same (.1)	560.00	0.10	56.00	Billable
8/3/2022 51909	Jennifer Hayes Admin Review email from UnitedLex re services provided and emails to and from R. Witthans re same (.1)	560.00	0.10	56.00	Billable
8/4/2022 51859	S. Finestone Admin Emails with client and review letter for demand on previous law firms.	560.00	0.30	168.00	Billable
8/4/2022 51890	Jennifer Hayes Admin Emails from and to K. Everett and R. Withans re United Lex billing statements (.1)	560.00	0.10	56.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/12/2022 52074	S. Finestone Admin Tel call with K. Fineman re correspondence from prior counsel for Benja	560.00	0.20	112.00	Billable
8/24/2022 52382	Jennifer Hayes Admin Review and revise pre-bill (.4); telephone call with S. Finestone re same (.1)	560.00	0.50	280.00	Billable
Total: Admin			19.00		\$9,544.50
<u>Activity: Adv Proceeding</u>					
6/8/2021 43585	S. Finestone Adv Proceeding Emails with client regarding settlement offer by Peters on claim for \$250,000 avoidance.	560.00	0.30	168.00	Billable
6/11/2021 43664	S. Finestone Adv Proceeding Further tel call with counsel for Peters re potential of receiving improved offer from Peters to settle.	560.00	0.20	112.00	Billable
10/20/2021 46422	Johnson Lee Adv Proceeding Reviewed assignment from S.Finestone, prior communications with T.Peters' counsel, e-mails and text messages re Benja to/from T.Peters, SAFEs and repurchase agreement (1.8); additional investigation and review of documents reflecting circumstances around investment in 2020 SAFE, agreement for repurchase, and disputed transfer of Benja funds (1.3).	385.00	3.10	1,193.50	Billable
10/21/2021 46423	Johnson Lee Adv Proceeding Legal research and review of case law supporting recovery of fraudulent transfer against subsequent transferee (1.4).  Drafted complaint against T.Peters for avoidance and recovery of fraudulent transfer, disallowance of claim, and declaratory relief (4.5).	385.00	5.90	2,271.50	Billable
10/22/2021 46424	Johnson Lee Adv Proceeding Supplemented factual allegations, reviewed and final edits to draft complaint (1.3). Communication to S.Finestone re complaint (0.2).  Retrieved and collected case law, and drafted legal analysis supporting recovery of transfer from subsequent transferee (0.8). Identified and compiled documents supporting factual allegations against T.Peters (0.7).	385.00	3.00	1,155.00	Billable
10/23/2021 46435	Johnson Lee Adv Proceeding Researched and reviewed case law re determination of initial transferee, application of dominion test, and applicability to case against T.Peters as subsequent transferee, and discussed analysis with S.Finestone (1.5).	385.00	1.50	577.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/27/2021 46436	Johnson Lee Adv Proceeding Reviewed S.Finestone's edits and comments to adversary proceeding complaint against T.Peters, applied proposed changes to complaint, and drafted analysis in response to comments re factual allegations (1.8).	385.00	1.80	693.00	Billable
11/2/2021 47013	Johnson Lee Adv Proceeding Drafted memo to S.Finestone re A.Chapin's testimony as it relates to case against T.Peters with supporting evidence (1.3).	385.00	1.30	500.50	Billable
1/4/2022 48200	Johnson Lee Adv Proceeding Received and reviewed Peters' motion to dismiss adversary proceeding (0.4).  Replied to S.Finestone and coordinate response (0.1). Call with S.Finestone re opposition to Peters' motion to dismiss (0.3).	385.00	0.80	308.00	Billable
1/11/2022 48215	Johnson Lee Adv Proceeding Began draft of Trustee's opposition to Peters' motion to dismiss adversary complaint (1.8).	385.00	1.80	693.00	Billable
1/12/2022 48211	Johnson Lee Adv Proceeding Finalized Trustee's opposition to Peters' motion to dismiss adversary proceeding (1.6). Prepared request for judicial notice and exhibit of Chapin's plea agreement (0.3). Communicated with S.Finestone re draft of opposition (0.1).	385.00	2.00	770.00	Billable
1/13/2022 48204	Johnson Lee Adv Proceeding Received and reviewed S.Finestone's comments to opposition to motion to dismiss and revised brief (1.1). Replied to S.Finestone (0.1).	385.00	1.20	462.00	Billable
1/14/2022 48216	Johnson Lee Adv Proceeding Reviewed S.Finestone's revisions to opposition brief, incorporated edits and made final corrections (0.4). Replied to S.Finestone (0.1).	385.00	0.50	192.50	Billable
1/24/2022 48212	Johnson Lee Adv Proceeding Reviewed Peters' reply brief to Trustee's opposition to motion to dismiss (0.2).  Communication with S.Finestone re additional context against Peters' theory of case (0.5).	385.00	0.70	269.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/25/2022 48213	Johnson Lee Adv Proceeding Reviewed court's order denying Peters' motion to dismiss (0.1).	385.00	0.10	38.50	Billable
5/31/2022 50392	Jennifer Hayes Adv Proceeding Review and analysis of multiple emails from K. Everett, M. St. James, and S. Finestone regarding Peters adversary proceeding and claims of being judgment proof (.2)	560.00	0.20	112.00	Billable
Total: Adv Proceeding			24.40		\$9,516.50
Activity: AP - Buerck					
12/3/2020 39567	S. Finestone AP - Buerck Finalize letter to Taco corporation/Buerck re litigation hold	560.00	0.60	336.00	Billable
12/4/2020 39617	S. Finestone AP - Buerck Finalize letter re litigation hold to Taco Corp of America	560.00	0.30	168.00	Billable
3/22/2021 42103	S. Finestone AP - Buerck Review materials from Joe Alouf regarding bitcoin and Buerck loan	560.00	0.50	280.00	Billable
4/11/2021 42488	S. Finestone AP - Buerck Draft memo to A. Leitner re case status, theories of recovery and assignments for next steps.	560.00	1.50	840.00	Billable
4/12/2021 42677	Amy Leitner AP - Buerck Review memo, email Ryan, begin organizing documents	300.00	4.60	1,380.00	Billable
4/12/2021 42515	S. Finestone AP - Buerck Complete draft memo re analysis of potential claims and document review; emails with R. Witthans and A. Leitner re same.	560.00	1.00	560.00	Billable
4/14/2021 42683	Amy Leitner AP - Buerck Investigation re claims against B. Buerck	300.00	2.00	600.00	Billable
4/16/2021 42635	S. Finestone AP - Buerck Discussions with A. Leitner re document production from SEC and documents related to potential liability of Buerck/Taco Corp; review portion of documents.	560.00	0.50	280.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/26/2021 43337	S. Finestone AP - Buerck Prepare for meeting with Chapin and his counsel and review documents related thereto.	560.00	1.50	840.00	Billable
6/2/2021 43515	S. Finestone AP - Buerck Prepare for and attend meeting with client and Andrew Chapin and Chapin counsel	560.00	2.70	1,512.00	Billable
7/7/2021 44434	Johnson Lee AP - Buerck Reviewed criminal complaint against A.Chapin and developments in criminal case (1.0). Analyzed document review of SEC production re details of business relationship and transfers between B.Buerck and Benja/A.Chapin (4.5).	385.00	5.50	2,117.50	Billable
7/8/2021 44435	Johnson Lee AP - Buerck Continued analysis of document review of SEC production (1.5). Researched potential theories of liability against B.Buerck (0.5). Began drafting memo re business relationship between B.Buerck and Benja/A.Chapin, potentially avoidable transfers from Benja to B.Buerck and causes of action (3.0).	385.00	5.00	1,925.00	Billable
7/9/2021 44453	Johnson Lee AP - Buerck Continued drafting memo re transfers to and potential claims against B.Buerck (1.7). Correspondence to S.Finestone, J.Hayes, and R.Witthans re memo (0.1). Began inspection of documents supporting case against B.Buerck (4.0).	385.00	5.80	2,233.00	Billable
7/9/2021 44256	S. Finestone AP - Buerck Review brief from Johnson Lee regarding claims against Buerck.	560.00	0.60	336.00	Billable
7/12/2021 44449	Johnson Lee AP - Buerck Continued inspection of documents and gathering evidence against B.Buerck (1.8).  Additional research re potential claims against transferees, Ponzi-scheme litigation in bankruptcy cases, effect on elements of causes of action, and pleading requirements (2.0).	385.00	3.80	1,463.00	Billable
7/13/2021 44486	Johnson Lee AP - Buerck Correspond with S.Finestone and R.Witthans re status of avoidance actions, next steps (0.1).  Began supplementing memo re analysis of payments to B.Buerck as fraudulent transfers (2.6).	385.00	2.70	1,039.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/21/2021 44416	S. Finestone AP - Buerck Discussions with J. Lee regarding claims against Buerck and drafting of complaint.	560.00	0.40	224.00	Billable
7/23/2021 44497	Jennifer Hayes AP - Buerck Emails to and from S. Finestone regarding complaint (.1)	525.00	0.10	52.50	Billable
8/2/2021 45186	Johnson Lee AP - Buerck Drafted factual allegations for complaint against B.Buerck with reference to business relationship and communications between B.Buerck and A.Chapin/Benja, investments and loans in Benja, and pressure to buyout B.Buerck's shares (5.3).	385.00	5.30	2,040.50	Billable
8/3/2021 45187	Johnson Lee AP - Buerck Continued drafting complaint against B.Buerck with additional factual allegations re Benja's fraudulent scheme, causes of action against B.Buerck for avoidance and recovery of fraudulent/preferential transfers under bankruptcy law, and avoidance of fraudulent transfers under applicable California law, disallowance of claim (4.5).	385.00	4.50	1,732.50	Billable
8/4/2021 45189	Johnson Lee AP - Buerck Researched California and Florida case law re alter ego liability for transfers from Benja to B.Buerck through Taco Corp. (1.8). Supplemented complaint with additional allegations re Taco Corp as alter ego of B.Buerck (1.4).	385.00	3.20	1,232.00	Billable
8/5/2021 45190	Johnson Lee AP - Buerck Finalized complaint against B.Buerck for avoidance and recovery of fraudulent/preferential transfers, alter ego liability, disallowance of claim (1.3).	385.00	1.30	500.50	Billable
8/27/2021 45231	Johnson Lee AP - Buerck Conferred with S.Finestone re complaint against B.Buerck (0.1), and follow-up e-mail to S.Finestone re complaint (0.1).	385.00	0.20	77.00	Billable
10/4/2021 45952	Jennifer Hayes AP - Buerck Telephone call with S. Finestone re Buerck complaint and next steps re same (.1)	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/6/2021 45991	Jennifer Hayes AP - Buerck Review and revise Buerck complaint (3.1); telephone call with S. Finestone re same (.1)	525.00	3.20	1,680.00	Billable
10/7/2021 46030	Jennifer Hayes AP - Buerck Continue revising draft complaint against Buerck and Taco Corp. (.6); email to S. Finestone re same (.1)	525.00	0.70	367.50	Billable
10/8/2021 46086	Jennifer Hayes AP - Buerck Emails from and to S. Finestone re draft Buerck complaint (.1); email to J. Lee regarding drafting discovery in MHC adversary proceeding (.1)	525.00	0.20	105.00	Billable
10/8/2021 46018	S. Finestone AP - Buerck Edits to draft complaint against Buerck	560.00	1.30	728.00	Billable
10/9/2021 46036	S. Finestone AP - Buerck Final edits to draft of complaint v Buerck and email J. Hayes re same.	560.00	0.40	224.00	Billable
10/13/2021 46157	Jennifer Hayes AP - Buerck Telephone call with S. Finestone re Buerck complaint (.1)	525.00	0.10	52.50	Billable
10/13/2021 46160	Jennifer Hayes AP - Buerck Review and revise Buerck complaint (.3); email to K. Everett re same and re Chase subpoena (.1)	525.00	0.40	210.00	Billable
10/13/2021 46142	S. Finestone AP - Buerck Discussions with J. Hayes re complaint against Buerck; review latest draft of complaint.	560.00	0.40	224.00	Billable
10/18/2021 46234	Jennifer Hayes AP - Buerck Follow up email to K. Everett re Buerck complaint and Chase subpoena (.1); review and respond to email from K. Everett re scheduling a call to discuss same (.1); telephone call with K. Everett re revisions to Buerck complaint (.1); review, revise and finalize same (.6); email to K. Everett re same and re strategy (.1); further emails from and to K. Everett and S. Finestone re strategy with respect to Buerck complaint (.3)	525.00	1.30	682.50	Billable
10/18/2021 46209	S. Finestone AP - Buerck Emails with client and J. Hayes re presentation of complaint against B. Buerck and potential settlement demand.	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/22/2021 46314	Jennifer Hayes AP - Buerck Telephone call with R. Michelson re draft complaint against Buerck and Taco Corp.	525.00	0.10	52.50	Billable
10/25/2021 46461	Ryan Witthans AP - Buerck Discussions with team re status of Buerck litigation (0.2).	350.00	0.20	70.00	Billable
10/26/2021 46367	Jennifer Hayes AP - Buerck Emails from and to K. Everett re response to R. Michelson request to further delay the filing of the Buerck complaint (.1); email to R. Michelson re same and further email to K. Everett re same (.1)	525.00	0.20	105.00	Billable
10/26/2021 46507	S. Finestone AP - Buerck Emails and tel calls re potential mediation of Buerck matters.	560.00	0.40	224.00	Billable
10/27/2021 46378	Jennifer Hayes AP - Buerck Emails from and to R. Michelson re scheduling call to discuss Buerck complaint (.1); telephone call with R. Michelson re mediation as alternative to prosecution of complaint (.1); email to K. Everett re same (.2); review and respond to email from K. Everett re same (.1);	525.00	0.50	262.50	Billable
11/1/2021 47030	Johnson Lee AP - Buerck Reviewed transcript of 2004 exam of A.Chapin (1.2).  Connected A.Chapin's testimony to documentary evidence (1.5).	385.00	2.70	1,039.50	Billable
Total: AP - Buerck			66.00		\$27,960.50
<u>Activity: AP - MHC</u>					
12/5/2020 39621	S. Finestone AP - MHC Review loan documents for Busey bank	560.00	0.60	336.00	Billable
12/6/2020 39622	S. Finestone AP - MHC Continue review of Busey Bank loan documents.	560.00	0.70	392.00	Billable
12/11/2020 39749	S. Finestone AP - MHC Emails with counsel for Busey bank	560.00	0.20	112.00	Billable
12/13/2020 39797	S. Finestone AP - MHC Emails with client regarding meeting with Busey bank and collateral issues.	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/8/2021 40290	S. Finestone AP - MHC Tel call with counsel for UMC re document request and transaction background under which they refused to fund loan.	560.00	0.30	168.00	Billable
1/11/2021 40377	S. Finestone AP - MHC Prep for call with Busey Bank (.3); Conf call with client and counsel for Busey bank re 2004 exams and related matters (.4); follow up on matters discussed in call (.4)	560.00	1.10	616.00	Billable
4/5/2021 42374	S. Finestone AP - MHC Research re potential basis to recover additional funds from MHC	560.00	0.80	448.00	Billable
4/6/2021 42380	S. Finestone AP - MHC Conf call with client regarding recovery theories on payments to MHC and other matters.	560.00	0.40	224.00	Billable
4/16/2021 42630	S. Finestone AP - MHC Prepare for conf call with MHC counsel (.4); attend conf call with K. Everett and counsel for MHC to discuss analysis of avoidance actions and MHC exposure (.4); follow up with Kyle re same.(.1)	560.00	0.90	504.00	Billable
4/21/2021 42697	S. Finestone AP - MHC Tel call with counsel for Busey with updates and analysis of MHC liability and emails with him re same; emails with counsel for Epowerment re updates.	560.00	0.60	336.00	Billable
4/29/2021 42831	S. Finestone AP - MHC Emails with creditors with updates and defense argument asserted by MHC	560.00	0.40	224.00	Billable
5/5/2021 42992	S. Finestone AP - MHC Review correspondence from MHC re potential defenses to estate's claims (.3); emails with client re same (.2); draft memo to creditor group summarizing defense arguments by MHC and research related to same (1.1)	560.00	1.60	896.00	Billable
5/7/2021 43069	S. Finestone AP - MHC Emails with counsel for Busey re analysis of MHC defense	560.00	0.40	224.00	Billable
5/24/2021 44046	Adam Rosen AP - MHC Review background documents and research Ponzi scheme case law and work on memos for additonal strategies and legal theories for recovery	450.00	1.50	675.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/25/2021 44047	Adam Rosen AP - MHC Memo to S. Finestone regarding litigation strategies against various parties and discuss same with S. Finestone	450.00	0.50	225.00	Billable
5/27/2021 43320	S. Finestone AP - MHC Research for and draft letter to counsel for MHC proposes settlement of estate claims.	560.00	1.80	1,008.00	Billable
5/28/2021 43378	S. Finestone AP - MHC Work on demand letter to MHC re repayment of preferential transfer and research re same.	560.00	1.80	1,008.00	Billable
6/1/2021 44049	Adam Rosen AP - MHC Review, revise and research in connection to response from litigation target - MHC.	450.00	2.20	990.00	Billable
6/1/2021 43510	S. Finestone AP - MHC Revisions to demand/settlement letter to MHC Financial and additional research related to letter; email to client re same.	560.00	1.10	616.00	Billable
6/3/2021 43554	S. Finestone AP - MHC Tel call with client regarding final revisions to demand letter to MHC and related matters and follow up emails re same.	560.00	0.60	336.00	Billable
6/13/2021 43676	S. Finestone AP - MHC Emails with counsel for MHC re response to demand letter.	560.00	0.10	56.00	Billable
6/30/2021 43986	S. Finestone AP - MHC Tel call with Kyle Everett re MHC settlement offer.	560.00	0.30	168.00	Billable
7/2/2021 44053	S. Finestone AP - MHC Tel call with A. Rosen regarding Ponzi scheme issues and counteroffer from MHC; research re same.	560.00	1.00	560.00	Billable
7/5/2021 44099	S. Finestone AP - MHC Draft memo to file/team outlining litigation matters, assigning complaints and discussing issues needed to be determined regarding Ponzi scheme, sub consolidation and other matters.	560.00	2.20	1,232.00	Billable
7/6/2021 44448	Johnson Lee AP - MHC Reviewed memo and communications from S.Finestone re facts and	385.00	1.60	616.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	issues in case (0.4). Reviewed correspondence between S.Finestone and B.Reed re claims against MHC and asserted defenses (0.5). Call with S.Finestone, J.Hayes, and R.Witthans re case issues and strategy (0.7).				
7/6/2021 44174	Ryan Witthans AP - MHC Draft chart of potential recovery sources; conference call with team re workflow (0.3).	350.00	0.30	105.00	Billable
7/6/2021 44124	Jennifer Hayes AP - MHC Review case background memo (.2); review emails from S. Finestone and R. Witthans re same (.1)	525.00	0.30	157.50	Billable
7/6/2021 44109	S. Finestone AP - MHC Team conf call re litigation matters and emails with Kyle Everett re same.	560.00	0.80	448.00	Billable
7/7/2021 44162	Jennifer Hayes AP - MHC Legal research re constructive trust (.2); emails from and to S. Finestone re same (.1)	525.00	0.30	157.50	Billable
7/7/2021 44114	S. Finestone AP - MHC Research regarding constructive trust argument/defense asserted by MHC Financial.	560.00	1.00	560.00	Billable
8/1/2021 45185	Johnson Lee AP - MHC Reviewed complaint against MHC (0.3), and researched complaints in Ponzi scheme cases re additional factual allegations (1.2).	385.00	1.50	577.50	Billable
8/3/2021 44814	S. Finestone AP - MHC Conf call with Kyle Everett and J. Hayes re complaint against MHC and related issues	560.00	0.60	336.00	Billable
8/4/2021 44844	S. Finestone AP - MHC Review latest draft of MHC complaint and email J. Hayes re same.	560.00	0.60	336.00	Billable
8/28/2021 45171	Jennifer Hayes AP - MHC Review and respond to email from B. Reed re scheduling discovery conference (.1)	525.00	0.10	52.50	Billable
8/31/2021 45299	Jennifer Hayes AP - MHC Emails to and from B. Reed regarding discovery conference (.1); draft joint discovery plan (.4); emails to and from S. Finestone re same (.1); emails to and from K. Everett re same (.1); review and respond to email from B.	525.00	1.50	787.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Reed re tomorrow's discovery conference (.1); communications with Wells Fargo re documents produced in response to subpoena (.2); email to K. Everett re same (.1); review and revise joint discovery plan (.1); emails from and to K. Everett re same (.1); further emails from and to K. Everett re same and further revisions to draft joint discovery plan (.1); email draft joint discovery plan to B. Reed (.1)				
9/1/2021 45359	Jennifer Hayes AP - MHC Prepare for and attend discovery conference with B. Reed (.2); review and respond to email from B. Reed re same (.1); analysis re next steps and email to K. Everett re same (.1); review and respond to email from K. Everett re same (.1); emails to and from B. Reed re same (.1); revise joint discovery plan (.1); email to K. Everett re same (.1); further emails from and to K. Everett and B. Reed re same (.2)	525.00	1.00	525.00	Billable
9/23/2021 45733	S. Finestone AP - MHC Review and comment on initial disclosures in MHC litigation.	560.00	0.40	224.00	Billable
9/24/2021 45799	Jennifer Hayes AP - MHC Emails from and to K. Everett re status conference (.1); prepare for same (.2); attend same (.4); emails from and to K. Everett re same (.1); telephone call with S. Finestone re same (.1)	525.00	0.90	472.50	Billable
10/25/2021 46297	S. Finestone AP - MHC Tel call with investor re subpoena received from MHC (.3); emails with 3rd party re same and review subpoena (.2); email to J. Hayes re potential objection to same (.1)	560.00	0.60	336.00	Billable
10/27/2021 46511	S. Finestone AP - MHC Emails and tel calls re subpoenas by MHC to third parties (creditors and investors) (.4); review package from MHC and emails re list of subpoenas to request duplicates (.3)	560.00	0.70	392.00	Billable
11/10/2021 46713	S. Finestone AP - MHC Further emails re discovery in MHC matter	560.00	0.20	112.00	Billable
11/14/2021 46802	S. Finestone AP - MHC Review and edit responses to MHC interrogatories and requests for production; email to J. Hayes re same.	560.00	0.60	336.00	Billable
11/30/2021 47005	S. Finestone AP - MHC Review discovery issues with J. Hayes related to MHC litigation.	560.00	0.20	112.00	Billable

8/26/2022  
3:32 PM

Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
12/2/2021 47141	S. Finestone AP - MHC Tel call with S. Soulios re response to MHC subpoenas and review responses, objections and document production from Mr. Soulios' clients.	560.00	1.00	560.00	Billable
12/3/2021 47158	S. Finestone AP - MHC Emails with counsel regarding responses to subpoena from MHC and review of further documentation.	560.00	0.40	224.00	Billable
12/9/2021 47278	Jennifer Hayes AP - MHC Emails from and to J. Switzer re rescheduling call to discuss case status (.1)	525.00	0.10	52.50	Billable
12/10/2021 47340	Jennifer Hayes AP - MHC Telephone call with J. Switzer re case status update (.3)	525.00	0.30	157.50	Billable
12/17/2021 47442	Jennifer Hayes AP - MHC Prepare for and attend status conference in MHC adversary proceeding (.8)	525.00	0.80	420.00	Billable
12/22/2021 47510	Jennifer Hayes AP - MHC Emails from and to K. Everett and S. Finestone re scheduling a call to discuss litigation strategy (.1)	525.00	0.10	52.50	Billable
12/27/2021 47601	Jennifer Hayes AP - MHC Prepare for meeting with K. Everett to discuss estate's litigation claims (.4); emails from and to S. Finestone and voicemail to S. Finestone re same (.1)	525.00	0.50	262.50	Billable
1/25/2022 48126	Jennifer Hayes AP - MHC Emails from and to S. Finestone re new case law potentially relevant to MHC litigation (.1); review data processing proposal from J. Holt (.1); emails to and from J. Zagajeski re same (.1); email to K. Everett re same (.1)	525.00	0.40	210.00	Billable
1/26/2022 48153	Jennifer Hayes AP - MHC Emails from and to B. Reed regarding 1/28 status conference (.1); telephone call with B. Reed re same (.1); email to L. Parada and A. Thomas re same (.1); emails from and to K. Everett regarding ESI proposal (.1); review and respond to email from A. Thomas re continued status conference (.1)	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/8/2022 48341	S. Finestone AP - MHC Emails with creditors (Busey Bank and Morgan) to update status of litigation and respond to other matters.	560.00	0.30	168.00	Billable
2/16/2022 48533	S. Finestone AP - MHC Review answer to complaint and email J. Hayes re discovery issues and status conf.	560.00	0.30	168.00	Billable
2/22/2022 48595	S. Finestone AP - MHC Tel call with counsel for various investors re MHC subpoenas	560.00	0.30	168.00	Billable
2/23/2022 48601	S. Finestone AP - MHC Further emails with counsel for various creditors re document production and MHC subpoena and payment of settlement by Buerck	560.00	0.20	112.00	Billable
3/14/2022 49087	S. Finestone AP - MHC Emails re status conf in MHC litigation	560.00	0.20	112.00	Billable
3/17/2022 49133	Jennifer Hayes AP - MHC Draft, review, and revise status conference statement for 3/25 status conference in Everett v MHC (.8); email to K. Everett re same (.1)	560.00	0.90	504.00	Billable
3/17/2022 49073	S. Finestone AP - MHC Review status conf statement and email re same.	560.00	0.40	224.00	Billable
3/18/2022 49359	Ryan Witthans AP - MHC Draft notice of hearing re motion for partial summary judgment in MHC adversary proceeding; emails with J. Hayes re same (0.3).	385.00	0.30	115.50	Billable
3/18/2022 49215	Jennifer Hayes AP - MHC Review, revise, and finalize status conference statement (.2); file same (n/c); email to S. Finestone re same (.1)	560.00	0.30	168.00	Billable
3/21/2022 49178	Jennifer Hayes AP - MHC Emails from and to K. Everett re potential additional claims owned by the estate (.2)	560.00	0.20	112.00	Billable
3/28/2022 49304	Jennifer Hayes AP - MHC Prepare for call with K. Everett regarding possible additional litigation claims owned by the estate (.3); telephone calls and emails from and to S. Finestone re same (.2); Zoom with K. Everett, J. Zagajeski, and S.	560.00	1.50	840.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Finestone re same (1.0)				
3/28/2022 49254	S. Finestone AP - MHC Zoom conf with K. Everett and J. Zagajeski re status of litigation and potential further claims (1.3); emails with counsel for Busey bank regarding various matters. (.2)	560.00	1.50	840.00	Billable
3/29/2022 49284	Jennifer Hayes AP - MHC Analysis re action items with respect to estate's claims against various parties (.4); draft list of next steps and re same and email to K. Everett, J. Zagajeski and S. Finestone re same (.3); review responses from K. Everett re same (.1); draft revised to do list and email to K. Everett re same (.3)	560.00	1.10	616.00	Billable
3/30/2022 49320	S. Finestone AP - MHC Further emails on follow up litigation targets and related asset recovery.	560.00	0.30	168.00	Billable
4/19/2022 49730	S. Finestone AP - MHC Conf call with Kyle Everett and Michael Stern (ERevshare) re case updates and litigation matters (.5); review of Stern's notes re interactions with Peters (.2)	560.00	0.70	392.00	Billable
6/24/2022 51082	Ryan Witthans AP - MHC Emails and texts with team re status conference; review case documents re same (0.3).	385.00	0.30	115.50	Billable
7/5/2022 51204	Jennifer Hayes AP - MHC Telephone call with S. Finestone re analysis of estate's potential malpractice claim and hearing on motion for partial summary judgment in MHC (.1)	560.00	0.10	56.00	Billable
7/13/2022 51324	Jennifer Hayes AP - MHC Review and analysis of memorandum re MHC's affirmative defenses (.4); emails from and to S. Finestone re same (.1)	560.00	0.50	280.00	Billable
7/18/2022 51433	Jennifer Hayes AP - MHC Review and analysis of evidentiary objections (.3); emails to and from R. Witthans re reply brief (.1)	560.00	0.40	224.00	Billable
7/18/2022 51589	Ryan Witthans AP - MHC Review and analyze MHC's opposition to trustee's motion for partial summary judgment; review and analyze responses to affirmative defenses (1.6).	385.00	1.60	616.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/19/2022 51488	Jennifer Hayes AP - MHC Review and analysis of S. Finestone memo regarding MHC opposition brief (.3); emails from and to S. Finestone re same and re today's Zoom with K. Everett (.1)	560.00	0.40	224.00	Billable
7/19/2022 51599	Ryan Witthans AP - MHC Legal research and drafting re reply in support of trustee's motion for partial summary judgment (6.4).	385.00	6.40	2,464.00	Billable
7/19/2022 51527	Jennifer Hayes AP - MHC Continue to review and analyze evidentiary objections and to draft response to same (1.2); legal research re evidentiary objections (.5); prepare for call with K. Everett and J. Zagajeski re reply brief to MHC oppo to partial summary judgment motion (.3); telephone call with K. Everett, J. Zagajeski and S. Finestone re same (.9); notes to file and emails to and from S. Finestone and R. Witthans re same (.2); email to R. Witthans re reply brief to MHC's objections (.1); emails from and to S. Finestone re objections to MHC's evidence (.1); begin drafting objections to MHC's evidence (2.1); further analysis re opposition brief and telephone call with R. Witthans re same (.5)	560.00	5.90	3,304.00	Billable
7/20/2022 51603	Ryan Witthans AP - MHC Legal research and drafting re reply in support of trustee's motion for partial summary judgment (7.1).	385.00	7.10	2,733.50	Billable
7/21/2022 51624	Ryan Witthans AP - MHC Legal research and drafting re reply in support of trustee's motion for partial summary judgment (9.1).	385.00	9.10	3,503.50	Billable
7/21/2022 51515	Jennifer Hayes AP - MHC Review multiple emails re draft reply brief (.1); telephone call with S. Finestone re same and re hearing on summary judgment motion (.1); review and revise objections to MHC's evidence and brief in reply to MHC's objections to Plaintiff's evidence (1.2); review and revise reply brief (1.4); emails to and from S. Finestone re same (.1)	560.00	2.90	1,624.00	Billable
7/22/2022 51610	Ryan Witthans AP - MHC Revise reply in support of trustee's motion for partial summary judgment; draft supporting declaration; emails with team re same (6.6).	385.00	6.60	2,541.00	Billable
7/22/2022 51580	Jennifer Hayes AP - MHC Legal research for reply brief (.6); multiple communications re reply brief (.4); review, analysis, and revisions of same (1.2); review, revise, and finalize objections to MHC's evidence and reply to MHC's objections (.7);	560.00	3.30	1,848.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	further communications re reply brief and evidentiary objection issues (.3); email to K. Everett and J. Zagajeski re evidentiary objections (.1); file same (n/c)				
7/26/2022 51807	Ryan Witthans AP - MHC Discuss reply in support of motion for partial summary judgment with S. Finestone (0.1).	385.00	0.10	38.50	Billable
7/26/2022 51668	S. Finestone AP - MHC Emails with creditors re briefing in MHC matter	560.00	0.10	56.00	Billable
7/28/2022 51794	Ryan Witthans AP - MHC Emails with J. Hayes re preparation for tomorrow's hearing on motion for partial summary judgment; legal research and drafting re hearing notes (0.9).	385.00	0.90	346.50	Billable
7/29/2022 51798	Ryan Witthans AP - MHC Review and analyze Busey Bank loan documents re control of funds; emails with J. Hayes re same (1.8). Legal research re questions posed at hearing; emails with J. Hayes re same; monitor hearing (0.7). Follow-up emails with team re same (0.2).	385.00	2.70	1,039.50	Billable
8/1/2022 51818	S. Finestone AP - MHC Emails with counsel for Busey and Empowerment re MSJ hearing	560.00	0.10	56.00	Billable
8/2/2022 51908	Jennifer Hayes AP - MHC Emails from and to L. Parada and B. Reed regarding scheduling of oral ruling on Plaintiff's motion for partial summary judgment (.1); emails to and from K. Everett re same (.1)	560.00	0.20	112.00	Billable
8/5/2022 52105	Ryan Witthans AP - MHC Monitor oral ruling; follow-up discussions with S. Finestone and J. Hayes re same (0.3).	385.00	0.30	115.50	Billable
8/5/2022 51961	Jennifer Hayes AP - MHC Emails from and to K. Everett regarding hearing for ruling on MHC summary judgment (.1); prepare for and attend same (.4); telephone call with K. Everett re next steps (.2); analysis re and telephone calls with S. Finestone re same (.3); further analysis re strategy and next steps (.6); telephone call with K. Everett re same (.4)	560.00	2.00	1,120.00	Billable
8/22/2022 52309	Jennifer Hayes AP - MHC Review and analysis of next steps in adversary proceeding (.4); telephone	560.00	0.90	504.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	call with S. Finestone re same (.2); emails to and from B. Reed re scheduling a call to discuss same (.1); telephone call with B. Reed re same (.2)				
8/22/2022 52279	S. Finestone AP - MHC Discuss next steps in MHC litigation with J Hayes.	560.00	0.20	112.00	Billable
8/23/2022 52367	Jennifer Hayes AP - MHC Review and respond to email from B. Reed regarding pre-status conference discussions re next steps (.1)	560.00	0.10	56.00	Billable
8/23/2022 52319	Jennifer Hayes AP - MHC Email to B. Reed re BDRP (.2); email to K. Everett regarding next steps (.2); telephone call with S. Finestone re same (.1)	560.00	0.50	280.00	Billable
8/24/2022 52383	Jennifer Hayes AP - MHC Analysis re status conference (.1); emails to and from B. Reed re same (.1); email to L. Parada re same (.1); review and respond to email from L. Parada re same and email to K. Everett re same (.1); further emails from and to K. Everett re same and re BDRP (.1)	560.00	0.50	280.00	Billable
Total: AP - MHC			100.30		\$48,667.50
Activity: Assets					
12/13/2020 39796	S. Finestone Assets Draft letter to Kelly Todd re return of \$64k payment.	525.00	0.60	315.00	Billable
12/14/2020 39814	S. Finestone Assets Finalize letter to K. Todd re transfer and emails re same.	525.00	0.50	262.50	Billable
2/8/2021 41123	S. Finestone Assets Draft letter to K. Todd re settlement of 64k payment	525.00	0.40	210.00	Billable
2/9/2021 41165	S. Finestone Assets Conf call with client regarding claims against business broker; update on 2004 exams and other matters	525.00	0.40	210.00	Billable
2/10/2021 41189	S. Finestone Assets Review correspondence and attachments from Kelly Todd re demand for payment	525.00	0.30	157.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/8/2021 41803	S. Finestone Assets Emails with counsel for Todd re estate claims.	525.00	0.20	105.00	Billable
3/9/2021 41837	S. Finestone Assets Tel call with Kyle Everett and counsel for Kelly Todd re demand letter for payment and related issues.	525.00	0.50	262.50	Billable
3/23/2021 42112	S. Finestone Assets Emails with counsel for Todd re response to demand	525.00	0.10	52.50	Billable
3/23/2021 42106	S. Finestone Assets Draft demand letter to counsel for Kema Partners/Inverness and Peters with demand for return of transfers; email to client re same.	525.00	1.00	525.00	Billable
3/25/2021 42189	S. Finestone Assets Tel call with counsel for Kema/Inverness - Ori Katz re demand for recovery of transfers; finalize letter and send to Mr. Katz	525.00	0.60	315.00	Billable
4/14/2021 42595	S. Finestone Assets Emails with counsel for Todd re updates	525.00	0.10	52.50	Billable
4/15/2021 42599	S. Finestone Assets Follow up emails with counsel for K Todd re settlement demand	525.00	0.10	52.50	Billable
4/16/2021 42632	S. Finestone Assets Tel call with counsel for K. Todd re potential claims against her; review email from counsel re offer and email client re same.	525.00	0.50	262.50	Billable
4/22/2021 42770	S. Finestone Assets Review letter from counsel for Peters/Kema re demand for payment and email counsel re same.	525.00	0.40	210.00	Billable
5/5/2021 43011	S. Finestone Assets Emails with counsel for Kema/Peters re defenses to estate's avoidance claim and research re Section 550 arguments.	525.00	1.00	525.00	Billable
10/21/2021 46256	S. Finestone Assets Emails with buyer of domain name.	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/25/2022 51636	Jennifer Hayes Assets Legal research re statute of limitations re possible claims against former law firm (.7); email to S. Finestone re same (.1)	560.00	0.80	448.00	Billable
7/29/2022 51742	S. Finestone Assets Meeting with Kyle and Chris Sullivan re possible litigation matters.	560.00	0.30	168.00	Billable
Total: Assets			7.90		\$4,186.00
<u>Activity: Claims</u>					
12/17/2020 39884	S. Finestone Claims Review recently filed claims	525.00	0.60	315.00	Billable
2/4/2021 41048	S. Finestone Claims Emails with K. Everett re claims in Ch. 7 case.	525.00	0.10	52.50	Billable
3/22/2021 42104	S. Finestone Claims Review letter from attorney demanding payment of admin claim for labor/wages; memo to A. Leitner re research on same.	525.00	0.70	367.50	Billable
3/30/2021 42231	S. Finestone Claims Review and edit draft letter to counsel for M. Reilly re Chapter 11 admin claim and demand for payment; emails with Kyle Everett re same.	525.00	0.50	262.50	Billable
3/31/2021 42303	S. Finestone Claims Finalize response to attorney for M. Reilly regarding asserted admin claim	525.00	0.20	105.00	Billable
4/9/2021 42464	S. Finestone Claims Emails with counsel for Kema Partners/Inverness re response to demand for return of payment	525.00	0.20	105.00	Billable
8/6/2021 44856	S. Finestone Claims Emails with counsel for M. Reilly re Ch. 11 admin claim.	525.00	0.20	105.00	Billable
8/10/2021 44720	S. Finestone Claims Tel call with counsel for creditor Reilly re admin claim (.3); review emails and case law regarding potential claim against trustee and emails with trustee re same (.6)	525.00	0.90	472.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
8/12/2021 44735	S. Finestone Claims Tel call with counsel for Morgan Reilly re Chapter 11 admin claim (.3); review case citations re potential trustee liability (.4); emails with Kyle Everett re revised W-2 and review emails with Gusto (payroll provider) re same.(.3)	525.00	1.00	525.00	Billable
8/23/2021 45071	S. Finestone Claims Discussions with Kyle Everett re claim by M. Reilly and property claim by Chapin	525.00	0.30	157.50	Billable
8/27/2021 45140	S. Finestone Claims Emails with counsel for Reilly re claim and corrected W-2	525.00	0.10	52.50	Billable
9/29/2021 45845	S. Finestone Claims Review email from counsel for Reilly and client re wages and related matters.	525.00	0.10	52.50	Billable
3/30/2022 49353	Jennifer Hayes Claims Review and analysis of emails from K. Everett and J. Zagajeski re additional subpoena to trace possible purchases of stock by A. Chapin (.1); review and revise list of action items and subpoenas to include same (.1); email to K. Everett and J. Zagajeski re same (.1)	560.00	0.30	168.00	Billable
3/31/2022 49397	Jennifer Hayes Claims Review email from J. Zagajeski re additional subpoena re A. Chapin's new business venture (.1); further revisions to do list re estate's possible additional claims (.1); emails to K. Evertt and J. Zagajeski re same (.1); further emails from and to S. Finestone and J. Zagajeski re same and further revisions to list (.2); review and analysis of J. Zagajeski work product re Benja board composition (.2)	560.00	0.80	448.00	Billable
Total: Claims			6.00		\$3,188.50
Activity: Complaint - MHC					
7/26/2021 44520	Jennifer Hayes Complaint - MHC Review background information re claims against MHC (1.3); emails from and to S. Finestone re same (.1); review 2004 transcript (1.1); review and analysis of additional background documents (.8); review and analysis of 6/3/21 settlement letter from FH Law to MHC (.2); telephone call with S. Finestone re claims against MHC (.1)	525.00	3.60	1,890.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/26/2021 44496	S. Finestone Complaint - MHC Outline of MHC complaint for J. Hayes.	560.00	0.50	280.00	Billable
7/27/2021 44596	Jennifer Hayes Complaint - MHC Draft complaint against MHC (4.1); email to S. Finestone re same (.1)	525.00	4.20	2,205.00	Billable
7/27/2021 44566	S. Finestone Complaint - MHC Begin review and edit of draft complaint against MHC	560.00	1.10	616.00	Billable
7/28/2021 44578	Jennifer Hayes Complaint - MHC Telephone call with S. Finestone re revisions to complaint (.1); revisions to draft complaint (.6); email to S. Finestone re same (.1)	525.00	0.80	420.00	Billable
7/28/2021 44567	S. Finestone Complaint - MHC Complete edit of draft of complaint against MHC and emails with J. Hayes re same	560.00	1.30	728.00	Billable
7/29/2021 44650	Jennifer Hayes Complaint - MHC Review email from S. Finestone re revised complaint and claims (.1); telephone call with S. Finestone re same (.1); legal research re underlying claims (.3)	525.00	0.50	262.50	Billable
7/29/2021 44615	S. Finestone Complaint - MHC Discussions with J. Hayes re fraudulent transfer claims in MHC complaint.	560.00	0.30	168.00	Billable
7/30/2021 44667	Jennifer Hayes Complaint - MHC Review and revise complaint (.4); email to S. Finestone re same (.1); review revised draft of complaint (.2); emails to and from K. Everett re same (.1)	525.00	0.80	420.00	Billable
7/30/2021 44631	S. Finestone Complaint - MHC Final review of MHC draft complaint	560.00	0.40	224.00	Billable
8/3/2021 44708	Jennifer Hayes Complaint - MHC Review emails from K. Everett and S. Finestone re draft complaint against MHC (.1); emails from and to S. Finestone and telephone call with S. Finestone regarding scheduling a call to discuss same (.1); prepare for and attend Zoom with K. Everett and S. Finestone (.5); emails from and to K. Everett re complaint (.1)	525.00	0.80	420.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/4/2021 44799	Jennifer Hayes Complaint - MHC Review and revise draft complaint against MHC (.5); email to K. Everett re same (.1); emails from and to and telephone call with K. Everett re subpoens (.1)	525.00	0.70	367.50	Billable
8/6/2021 44782	Jennifer Hayes Complaint - MHC Draft Chase and Wells Fargo subpoenas and research re legal names of same (1.3); emails to and from K. Everett re same (.1); emails from and to S. Finestone re MCH complaint (.1); review notice to Plaintiff (.1); review BDRP information sheet and rules for service of summons and complaint (.1); serve summons and complaint (.1); draft proof of service re same(.2, bill for .1); email to K. Everett re service of summons and complaint (.1)	525.00	2.00	1,050.00	Billable
8/8/2021 44798	Jennifer Hayes Complaint - MHC Emails from and to B. Reed regarding service of summons and complaint (.1)	525.00	0.10	52.50	Billable
9/7/2021 45458	Jennifer Hayes Complaint - MHC Review and respond to email from C. Chow re MHC's answer to complaint (.1)	525.00	0.10	52.50	Billable
9/9/2021 45523	Jennifer Hayes Complaint - MHC Review answer to complaint (.1); email to K. Everett re same (.1); email to B. Reed re status of joint discovery conference statement (.1); emails from and to S. Finestone re Chase bank contact for meet and confer re subpoena (.1); emails from and to K. Everett re same and re Bank of America subpoena (.1); review and respond to email from B. Reed re joint discovery conference (.1)	525.00	0.60	315.00	Billable
9/10/2021 45528	Jennifer Hayes Complaint - MHC Review and respond to email from B. Reed re joint discovery plan and pro hac issue (.1); review and revise joint discovery plan and email to B. Reed re same (.1)	525.00	0.20	105.00	Billable
9/11/2021 45533	Jennifer Hayes Complaint - MHC Emails from and to B. Reed re final change to joint discovery plan (.1); revise, finalize, and file same and follow up email to B. Reed re same (.1)	525.00	0.20	105.00	Billable
9/21/2021 45712	Jennifer Hayes Complaint - MHC Draft initial disclosures (2.4)	525.00	2.40	1,260.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/22/2021	Jennifer Hayes 45776 Complaint - MHC Further revisions to Plaintiff's initial disclosures (.4); email to S. Finestone re same (.1); telephone call with S. Finestone re same (.1)	525.00	0.60	315.00	Billable
9/23/2021	Jennifer Hayes 45749 Complaint - MHC Follow-up email to S. Finestone re initial disclosures (.1); emails from and to S. Finestone re same (.1); emails from and to K. Everett re same (.1); final revisions to same (.2); email service copy to opposing counsel (.1); draft proof of service of same (.1); emails from and to B. Reed re MHC's initial disclosures (.1); review same (.1); email to K. Everett re same (.1); draft certificate of service (.1)	525.00	1.10	577.50	Billable
10/25/2021	Kim Fineman 46428 Complaint - MHC Analyze Answer by MHC Financial against Complaint to determine points admitted (1.6); Review Initial Disclosures (.2).	425.00	1.80	765.00	Billable
Total: Complaint - MHC			24.10		\$12,598.50
<u>Activity: Creditor Issues</u>					
11/19/2020	S. Finestone 39255 Creditor Issues Review SAFE agreements received from Joe Z and compare with creditor matrix and schedules; email to client regarding notice and claim issues.	525.00	0.70	367.50	Billable
1/12/2021	S. Finestone 40383 Creditor Issues Conf call with E-Rev Share re status of investigations and conversion of case	525.00	0.40	210.00	Billable
1/17/2021	S. Finestone 40545 Creditor Issues Emails with counsel for Busey re 2004 applications and conversion motion	525.00	0.30	157.50	Billable
1/24/2021	S. Finestone 40746 Creditor Issues Emails with A. Chapin re mail sent to debtor address	525.00	0.10	52.50	Billable
2/10/2021	S. Finestone 41187 Creditor Issues Tel call with counsel for Busey with updates	525.00	0.30	157.50	Billable
2/10/2021	S. Finestone 41188 Creditor Issues Tel call with Steve Soulios, counsel for various creditors, re scheduling 2004 exams and his participation in same.	525.00	0.30	157.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/30/2021 42283	Amy Leitner Creditor Issues Finish research (2) and write draft letter regarding demand by former employee (1.5)	300.00	3.50	1,050.00	Billable
4/15/2021 42598	S. Finestone Creditor Issues Emails with S. Soulios regarding various matters.	525.00	0.30	157.50	Billable
4/22/2021 42769	S. Finestone Creditor Issues Conf call with Michael Stern at EPowerment re update of collection efforts and overall case status.	525.00	0.50	262.50	Billable
5/24/2021 43271	S. Finestone Creditor Issues Emails with counsel for Chapin; emails with M. Stern at MS Empowerment re status questions.	560.00	0.40	224.00	Billable
6/4/2021 43562	S. Finestone Creditor Issues Emails with Empowerment re various issues and with counsel for Reilly re W-2s and claim.	525.00	0.40	210.00	Billable
6/28/2021 43956	S. Finestone Creditor Issues Emails with counsel for Busey and with EPowerment to update status.	525.00	0.30	157.50	Billable
7/20/2021 44394	S. Finestone Creditor Issues Emails with EPowerment regarding updates	525.00	0.20	105.00	Billable
7/21/2021 44415	S. Finestone Creditor Issues Follow up email with Epowerment with case update	525.00	0.10	52.50	Billable
9/20/2021 45668	S. Finestone Creditor Issues Emails with Michael Stern (Epowerment) re updates and issues in upcoming Peters examination.	525.00	0.20	105.00	Billable
9/21/2021 45677	S. Finestone Creditor Issues Emails with counsel for Busey and counsel for various creditors with update and discussion of various issues.	525.00	0.30	157.50	Billable
9/27/2021 45789	S. Finestone Creditor Issues Review email from counsel for M. Reilly and emails with client re same.	525.00	0.10	52.50	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/25/2021 46296	S. Finestone Creditor Issues Emails with counsel for ERevshare with updates.	525.00	0.20	105.00	Billable
10/27/2021 46512	S. Finestone Creditor Issues Emails with counsel for Busey and counsel for Empowerment re case updates.	525.00	0.40	210.00	Billable
11/15/2021 46811	S. Finestone Creditor Issues Emails with primary creditors with update on status of litigation matters and related matters.	525.00	0.20	105.00	Billable
11/17/2021 46840	S. Finestone Creditor Issues Tel call with counsel for EPowerment re status of case and related matters.	525.00	0.30	157.50	Billable
12/1/2021 47120	S. Finestone Creditor Issues Tel call with S. Soulios (counsel for investors) regarding subpoena issues and emails with counsel for Tommy Goode	525.00	0.30	157.50	Billable
5/3/2022 49977	S. Finestone Creditor Issues Emails with ERevshare rep re claim issues.	560.00	0.10	56.00	Billable
5/4/2022 50014	S. Finestone Creditor Issues Tel call with Michael Stern re potential transfer of claim	560.00	0.20	112.00	Billable
Total: Creditor Issues			10.10		\$4,539.50
Activity: Disc MHC ESI					
11/29/2021 47034	Johnson Lee Disc MHC ESI Call with J.Hayes re e-discovery issues in MHC adversary proceeding (0.1). Reviewed complaint, answer, earlier 2004 exam and productions, initial disclosures and discovery requests for background and relevant search terms, and compiled list (5.4). Follow up communications with J.Hayes re keywords and scope of search (0.2).	385.00	5.70	2,194.50	Billable
11/29/2021 47000	Jennifer Hayes Disc MHC ESI MHC: draft list of search terms for document review (1.3); telephone call with J. Lee re same (.1); email to J. Lee re same (.1); review revised draft list of search terms (.1); emails from and to J. Lee re same (.1)	525.00	1.70	892.50	Billable
11/30/2021 47016	Jennifer Hayes Disc MHC ESI Review and revise list of search terms for MHC document production (.3);	525.00	1.10	577.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	emails from and to J. Lee re same (.1); email to S. Finestone re same (.1); emails from and to B. Reed regarding Plaintiff's first set of discovery (.1); analysis re document production to MHC (.2); telephone call with S. Finestone re same (.1); email to J. Zagajeski re same (.1); further emails from and to J. Zagajeski re same (.1)				
12/1/2021 47146	Jennifer Hayes Disc MHC ESI Review and respond to email from K. Everett re document production issues (.1); email to O. Barrueto at DocuEvidence re same (.2); further emails to and from DocuEvidence re e-discovery issues (.2); emails from and to K. Everett and J. Zagajeski regarding scheduling a call to discuss same (.1); review email from B. Reed re MHC 2004 transcript and email to S. Finestone re same (.1)	525.00	0.70	367.50	Billable
12/2/2021 47152	Jennifer Hayes Disc MHC ESI Emails from and to O. Barrueto and T. Stefan re phone call to discuss e-discovery issues (.1)	525.00	0.10	52.50	Billable
12/3/2021 47195	Jennifer Hayes Disc MHC ESI Telephone call with K. Everett, J. Zagajeski, and T. Steffan regarding e-discovery issues (.4); further telephone call with K. Everett re same (.1); email to R. Witthans re status of download of documents from subpoena response and R. Michelson (.1); follow up emails to and from S. Finestone regarding B. Reed request for 2004 transcript (.1); email to B. Reed re same (.1); follow up email to K. Everett and J. Zagajeski regarding e-discovery issue (.1); further emails from and to K. Everett and J. Zagajeski re same (.1)	525.00	1.00	525.00	Billable
12/5/2021 47204	Jennifer Hayes Disc MHC ESI Emails from and to J. Zagajeski regarding back-up drives of computers (.1)	525.00	0.10	52.50	Billable
12/6/2021 47296	Ryan Witthans Disc MHC ESI Emails with Titan Legal Services re electronic production of documents from JPMorgan Chase Bank and Moosylvania Marketing; receive and review document production sets (0.7).	350.00	0.70	245.00	Billable
12/6/2021 47235	Jennifer Hayes Disc MHC ESI Emails from and to J. Zagajeski re hard drives and meet with J. Zagajeski re same (.1); email to T. Steffan and O. Barrueto regarding turnover of computers and hard drives for e-discovery analysis (.1); review objections to MHC subpoenas (.1); emails from and to S. Finestone re same (.1); telephone call with J. Zagajeski regarding computers and hard drives (.1); emails from and to J. Zagajeski re same (.1); review and respond to email from e-discovery expert regarding computers and timing of obtaining same (.1); emails from and to B. Reed regarding extension of time for MHC discovery responses and timings issues re Trustee's document production	525.00	2.30	1,207.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	(.2); emails from and to R. Witthans regarding various document productions (.1); review and analysis of JP Morgan Chase production (.3); email to K. Everett and J. Zagajeski re same (.1); review and revise MHC discovery tracker (.2); further email to K. Everett and J. Zagajeski re additional documents produced her MHC subpoenas (.1); review documents produced by E-Revshare Core LLC (.5); begin reviewing Moosylvania Marketing production (.1)				
12/28/2021 47598	Jennifer Hayes Disc MHC ESI MHC, emails from and to B. Reed regarding scheduling a call to discuss discovery issues (.1); email to K. Everett and J. Zagajeski re status of computers and hard drive for turnover to e-discovery expert (.1)	525.00	0.20	105.00	Billable
12/29/2021 47558	Jennifer Hayes Disc MHC ESI Emails from and to B. Reed re rescheduling call to discuss discovery issues (.1); telephone call with B. Reed re same (.2); review and respond to email from J. Zagajeski regarding document production and Benja computer issues (.4); review email from B. Reed requesting extension of time to respond to written discovery and email to S. Finestone re same (.1); review and respond to email from J. Zagajeski re computers and hard drive (.1); emails from and to K. Everett regarding B. Reed requested extension to respond to discovery and emails to and from B. Reed re same (.1)	525.00	1.00	525.00	Billable
1/3/2022 47766	Jennifer Hayes Disc MHC ESI Telephone call with S. Finestone re e-discovery issues (.1); research re e-discovery expert and email to K. Everett re same (.2); telephone call with e-discovery expert re same (.2); follow up email re same (.1)	525.00	0.60	315.00	Billable
1/4/2022 47713	Jennifer Hayes Disc MHC ESI Follow up email to e-discovery expert (.1); multiple further emails from and to e-discovery expert re engagement, scope, and timing (.2); emails to and from K. Everett re same (.1); multiple further communications with K. Everett and e-discovery expert re next steps (.2); emails from and to J. Holt and K. Everett re cost estimate for e-discovery (.1); further emails from and to J. Holt and M. Hernandez re computers and hard drive (.1); review draft contract with e-discovery expert and emails from and to J. Holt re same (.1); review and revise draft engagement agreement from ESI provider (.4); emails to and from K. Everett re same (.1);	525.00	1.40	735.00	Billable
1/6/2022 47754	Jennifer Hayes Disc MHC ESI Email to J. Holt re status and timing of ESI review of computers and hard drive (.1); review and respond to email from J. Holt (.1); emails to and from S. Finestone regarding protective order issue (.1); review chain of custody email and email to K. Everett and J. Zagajeski re same (.1); emails from and to K. Everett re scope of work (.1); further emails from and to K. Everett and J. Zagajeski re same (.1); emails from and to K. Everett re	525.00	1.00	525.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	scheduling a call to discuss search terms with ESI expert and email to ESI expert re same (.1); emails from and to K. Everett re ESI search terms (.1); emails from and to J. Zagajeski and ESI expert regarding scheduling a call to discuss project scope and search terms (.1); review and respond to email from ESI expert re same (.1)				
1/7/2022 47806	Jennifer Hayes Disc MHC ESI Emails from and to ESI team re scheduling a call to discuss project (.1); emails from and to K. Everett re same (.1); telephone call with K. Everett re same (.1); further emails from and to M. Braun re same (.1); further emails from and to K. Everett re same (.1); review and respond to email from K. Everett re scheduling a call to discuss MHC search terms (.1); telephone call with K. Everett re same (.2); review and respond to email from B. Reed re MHC's discovery responses (.1); email to K. Everett and J. Zagajeski re same (.1); prepare for call with e-discovery expert (.2); emails from and to K. Everett and J. Zagajeski re same (.1); call with ESI expert re next steps (.5)	525.00	1.80	945.00	Billable
1/12/2022 47914	Jennifer Hayes Disc MHC ESI Review and respond to emails from M. Braun re status of computer imaging and email to K. Everett and J. Zagajeski re same (.1); review and respond to email from K. Everett re same (.1); review email from M. Braun and email to K. Everett and J. Zagajeski re same (.1); further emails re same (.1); review and respond to email from O. Barrueto re ESI project (.1)	525.00	0.50	262.50	Billable
1/13/2022 47919	Jennifer Hayes Disc MHC ESI Emails from and to M. Braun re status of ESI analysis (.1); further emails from and to M. Braun re same and re next steps (.1); emails from and to S. Finestone re status of document production to MHC (.1)	525.00	0.30	157.50	Billable
1/14/2022 47957	Jennifer Hayes Disc MHC ESI Multiple communications with ESI expert re computer analyses and reports (.3); email to K. Everett and J. Zagajeski re same (.1)	525.00	0.40	210.00	Billable
1/17/2022 47997	Jennifer Hayes Disc MHC ESI Begin analyzing ESI reports re Chapin's two computers (.4)	525.00	0.40	210.00	Billable
1/18/2022 47995	Jennifer Hayes Disc MHC ESI Review and analysis of information from ESI reports (.2); email to K. Everett and J. Zagajeski re same (.1)	525.00	0.30	157.50	Billable
1/19/2022 48014	Jennifer Hayes Disc MHC ESI Telephone call with S. Finestone re status of Chapin 2004 examination (.1); review and respond to email from J. Holt re ESI options (.1); review and analysis of proposal and email to K. Everett re same (.2); review email	525.00	1.30	682.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	from K. Everett re same and email to J. Holt re same (.1); further analysis re ESI proposal and selection of file types to review (.4); emails to and from K. Everett and J. Zagajeski re same (.1); review email from UnitedLex re scheduling a call to discuss next steps and email to K. Everett and J. Zagajeski re same (.1); further emails re same (.2)				
1/20/2022 48026	Jennifer Hayes Disc MHC ESI Prepare for and participate in telephone call re ESI issues with K. Everett, J. Zagajeski, and UnitedLex (.7)I telephone call with S. Finestone re A. Chapin deposition (.1)	525.00	0.80	420.00	Billable
1/27/2022 48171	Jennifer Hayes Disc MHC ESI Further analysis re ESI issues and telephone call with K. Everett re same (.3)	525.00	0.30	157.50	Billable
1/28/2022 48180	Jennifer Hayes Disc MHC ESI Telephone call with K. Everett regarding ESI project (.1); emails from and to J. Holt re same (.1)	525.00	0.20	105.00	Billable
1/31/2022 48209	Jennifer Hayes Disc MHC ESI Emails to and from J. Holt regarding data export and processing proposal (.1); emails to and from K. Everett re same (.1); further emails to and from J. Holt and K. Everett re same (.1)	525.00	0.30	157.50	Billable
2/1/2022 48313	Jennifer Hayes Disc MHC ESI Emails from and to J. Holt re next steps for processing of data (.1); emails from and to M. Knutsen re same (.1)	525.00	0.20	105.00	Billable
2/8/2022 48404	Jennifer Hayes Disc MHC ESI Emails to and from M. Knutsen regarding status of processing of data from Benja computers (.1); telephone call with R. Witthans re same (.1)	525.00	0.20	105.00	Billable
2/11/2022 48423	Jennifer Hayes Disc MHC ESI Review and respond to email from UnitedLex re e-discovery status (.1)	525.00	0.10	52.50	Billable
2/14/2022 48457	Jennifer Hayes Disc MHC ESI Emails from and to M. Knudsen re e-discovery processing status and relativity training (.1)	525.00	0.10	52.50	Billable
2/16/2022 48585	Ryan Witthans Disc MHC ESI Monitor emails with UnitedLex re processing of laptop data (0.1).	385.00	0.10	38.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/16/2022 48566	Jennifer Hayes Disc MHC ESI Email to M. Knudsen re status of processing of data from computers (.1); further emails from and to M. Knudsen re same (.2)	560.00	0.30	168.00	Billable
2/21/2022 48635	Jennifer Hayes Disc MHC ESI Emails from and to M. Knudsen re processing of e-discovery and importation into Relativity (.1); review email from M. Knudsen re training in Relativity and email to K. Everett and J. Zagajeski re same (.1); follow up email to M. Knudsen re same (.1)	560.00	0.30	168.00	Billable
2/22/2022 48705	Ryan Witthans Disc MHC ESI Monitor emails with team re ESI and Relativity training (0.3).	385.00	0.30	115.50	Billable
2/22/2022 48637	Jennifer Hayes Disc MHC ESI MS Teams meeting with M. Knudsen re e-discovery issues (.7); begin reviewing documents (2.3); emails to and from M. Knudsen re document review (.2); email to K. Everett and J. Zagajeski re same (.1)	560.00	3.30	1,848.00	Billable
2/23/2022 48682	Jennifer Hayes Disc MHC ESI Telephone call with S. Finestone re status of document review (.1)	560.00	0.10	56.00	Billable
2/24/2022 48734	Jennifer Hayes Disc MHC ESI Continue review of documents in respond to MHC discovery demands (2.6)	560.00	2.60	1,456.00	Billable
2/25/2022 48729	Ryan Witthans Disc MHC ESI Phone call with J. Hayes re discovery, document review, and narrowing of issues in adversary proceedings to limit scope of discovery; review documents re same (0.4).	385.00	0.40	154.00	Billable
2/27/2022 48709	Ryan Witthans Disc MHC ESI Review emails with ESI consultant re Relativity account and training; emails with J. Hayes re same (0.2).	385.00	0.20	77.00	Billable
2/28/2022 48710	Ryan Witthans Disc MHC ESI Phone call with J. Hayes re document review; review, analyze, and code documents in Relativity (0.6).	385.00	0.60	231.00	Billable
2/28/2022 48685	Jennifer Hayes Disc MHC ESI Telephone call with R. Witthans regarding document review for MHC document production (.5); emails from and to M. Knudsen re same (.1)	560.00	0.60	336.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/4/2022 49020	Ryan Witthans Disc MHC ESI Emails with J. Hayes re status of document review (0.1).	385.00	0.10	38.50	Billable
3/4/2022 48847	Jennifer Hayes Disc MHC ESI Email to R. Witthans re status of document review in MHC (.1)	560.00	0.10	56.00	Billable
3/8/2022 49024	Ryan Witthans Disc MHC ESI Phone call with J. Hayes re document review (0.1). Review "MHC" documents in Relativity for relevance and privilege; create shortcuts to streamline coding process; phone call with J. Hayes re corrections to coding on certain documents (2.0).	385.00	2.10	808.50	Billable
3/8/2022 48915	Jennifer Hayes Disc MHC ESI Telephone call with R. Witthans re document review questions (.1)	560.00	0.10	56.00	Billable
3/9/2022 49001	Ryan Witthans Disc MHC ESI Review "MHC" documents in Relativity for relevance and privilege; research to confirm other interested parties' law firms; update document review tracker (1.3).	385.00	1.30	500.50	Billable
3/12/2022 49005	Ryan Witthans Disc MHC ESI Continue review of "MHC" documents in Relativity for relevance and privilege (1.0).	385.00	1.00	385.00	Billable
3/14/2022 49007	Ryan Witthans Disc MHC ESI Continue review of "MHC" documents in Relativity for relevance and privilege (0.2).	385.00	0.20	77.00	Billable
3/15/2022 49342	Ryan Witthans Disc MHC ESI Continue review of "MHC" documents in Relativity for relevance and privilege; update document review tracker (0.9).	385.00	0.90	346.50	Billable
3/15/2022 48989	Jennifer Hayes Disc MHC ESI Review and respond to email from J. Zagajeski regarding location of computers (.1); review and analysis of United Lex invoices and local rules re payment of same (.2); email to K. Everett re same (.1); email to UnitedLex re return of computers (.1)	560.00	0.50	280.00	Billable
3/16/2022 49346	Ryan Witthans Disc MHC ESI Monitor emails with team re return of laptops (0.2). Phone call with J. Hayes re motion for summary judgment in MHC adversary proceeding; initial research re same (0.3). Continue review of "MHC" documents in	385.00	1.20	462.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Relativity for relevance and privilege; update document review tracker (0.7).				
3/16/2022 49116	Jennifer Hayes Disc MHC ESI Review email from M. Knutsen re return of computers and email to J. Zagajesky re same (.1); review and respond to email from J. Zagajesky re same and email to M. Knutsen re same (.1); follow up email to J. Holt and M. Knutsen re back up for first UnitedLex invoice (.1); further emails from and to M. Knutsen re return of computers (.1)	560.00	0.40	224.00	Billable
3/18/2022 49358	Ryan Witthans Disc MHC ESI Continue review of "MHC" documents in Relativity for relevance and privilege; update document review tracker (1.9).	385.00	1.90	731.50	Billable
3/21/2022 49367	Ryan Witthans Disc MHC ESI Continue review of "MHC" documents in Relativity for relevance and privilege; update document review tracker (1.6). Emails with team re status of document review for upcoming status conference; draft blurb re same (0.7). Further review of "MHC" documents; update document review tracker (1.0).	385.00	3.30	1,270.50	Billable
3/22/2022 49370	Ryan Witthans Disc MHC ESI Continue review of "MHC" documents in Relativity for relevance and privilege; recode subsets of personal emails, attorney communications, and cryptocurrency emails; update document review tracker (4.9).	385.00	4.90	1,886.50	Billable
3/23/2022 49423	Ryan Witthans Disc MHC ESI Emails and phone calls with J. Hayes and K. Fineman re status of document review, motion for partial summary judgment, and FRCP 37 conference (1.5). Review and analyze pleadings, discovery responses, and motion papers re FRCP 37 conference and status conference (3.6). Second-pass review of "MHC" documents re additional relevance and privilege issues (3.4). Emails with UnitedLex re production set and privilege log; and follow-up email to J. Hayes re same (0.5).	385.00	9.00	3,465.00	Billable
3/24/2022 49424	Ryan Witthans Disc MHC ESI Videoconference with UnitedLex re redactions and production parameters; apply redactions to partially privileged documents; review and confirm production parameters (1.2). Prepare for and participate in FRCP 37 conference; follow-up call with K. Fineman re same (1.6). Draft and revise letter following up re FRCP 37 conference (4.3). Follow-up emails and calls with team and UnitedLex re production set and privilege log; review internal and external drafts of privilege log and quality control check production set; produce document set and privilege log to opposing counsel; follow-up comments to team re same (1.7).	385.00	8.80	3,388.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
3/31/2022 49391	Ryan Witthans Disc MHC ESI Emails with S. Finestone and Busey Bank counsel re document production; download and review production set; share with team (0.5). Phone call with K. Fineman re discovery dispute with MHC and document review/production status; follow-up review of "MHC" search hit family member documents on Relativity and email to UnitedLex re same (0.7). Review and analyze docket order re discovery dispute; emails with team re same (0.3). Doc review re "MHC" search hit family members; draft chart of discovery dispute status per each document request (0.6).	385.00	2.10	808.50	Billable
4/1/2022 49535	Ryan Witthans Disc MHC ESI Review and analyze issue chart from K. Fineman; emails with team re discovery negotiations (0.7). Document review re "MHC" search hit family members (0.3). Emails with S. Finestone re discovery scope discussions (0.1). Draft to-do list re MHC-related litigation (0.3).	385.00	1.40	539.00	Billable
4/4/2022 49536	Ryan Witthans Disc MHC ESI Phone call with J. Hayes re discovery dispute negotiations (0.3). Follow-up phone call with J. Hayes and emails with UnitedLex re same; review and finalize proposed search term list (0.7). Emails with MHC counsel to arrange further discussions (0.1).	385.00	1.10	423.50	Billable
4/4/2022 49531	Jennifer Hayes Disc MHC ESI Analysis re discovery dispute with MHC and next steps and telephone calls with R. Witthans and S. Finestone re same (1.4); review and analysis of list of search terms (.2); email to K. Everett re same (.1); review and respond to email from K. Everett re same and review revised list of search terms (.1); multiple emails from and to UnitedLex, and analysis re, revised search terms and next steps (.4); emails from and to K. Everett re scheduling a call to discuss discovery (.1)	560.00	2.30	1,288.00	Billable
4/5/2022 49540	Ryan Witthans Disc MHC ESI Emails with UnitedLex and review of documents re privilege, search terms, and estimated timeline/budget for document review (0.5). Prepare for and participate in discovery dispute conference call with MHC; debrief call with J. Hayes; research additional search terms (2.1).	385.00	2.60	1,001.00	Billable
4/5/2022 49485	Jennifer Hayes Disc MHC ESI Emails from and to M. Knudsen re further revisions to search terms and analysis of same (.3); emails from and to R. Witthans and C. Oliver regarding privilege issues (.1); telephone call with K. Everett re document production (.3); emails from and to and telephone call with R. Witthans re same (.2); review email from M. Knutsen re hit count after revision to search terms to remove privileged documents (.1); draft discovery tracker regarding documents received by the estate (1.9); email to J. Zagajeski re discovery issues (.1); telephone call with R. Witthans re discovery issues	560.00	3.80	2,128.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	(.5); telephone call with R. Witthans and S. Finestone re same (.1); email to S. Finestone regarding documents in certain subfolders (.1); review and respond to email from S. Finestone re same (.1)				
4/5/2022 49719	S. Finestone Disc MHC ESI Further emails and tel calls re discovery production and related issues.	560.00	0.30	168.00	Billable
4/6/2022 49691	Ryan Witthans Disc MHC ESI Compare proposed search terms with MHC's discovery requests; revise search term list; emails with UnitedLex re same; follow-up emails and phone call with MHC counsel (2.0). Email status update to trustee; emails with court re requested continuance re discovery dispute hearing; follow-up emails with team re document production status (0.8). Follow-up emails with UnitedLex re same (0.2). Emails with J. Hayes re lack of MHC production; review emails and document sets re same (0.5).	385.00	3.50	1,347.50	Billable
4/6/2022 49486	Jennifer Hayes Disc MHC ESI Review emails from R. Witthans and M. Knutsen regarding revisions to search terms (.1); email to R. Witthans re updates to discovery tracker (.1); further revisions to discovery tracker and analysis re discovery issues (1.2); emails to and from R. Witthans and S. Finestone re same (.1); emails from and to R. Witthans and M. Knudsen re search terms issues (.2); review B. Reed response to latest meet and confer re discovery dispute (.1); emails from and to R. Witthans re same (.2); further analysis re and emails from and to R. Witthans re MHC discovery dispute (.2); review and analysis of UnitedLex proposal for document review (.1); review and revise list of third party productions (.2); email to S. Finestone and R. Witthans re same (.1); further emails from and to S. Finestone re same (.1); telephone call with S. Finestone re MHC discovery issues (.1); analysis re MHC's discovery failures (.3); email to R. Witthans re same (.1); further review and revise list of third party productions (.2); email to K. Everett re same (.1); further emails from and to R. Witthans re MHC discovery failures (.1)	560.00	3.60	2,016.00	Billable
4/11/2022 49582	Jennifer Hayes Disc MHC ESI Review and respond to email from R. Witthans re revisions to discovery tracker and scheduling call to discuss same (.1); review numerous emails re various discovery issues from DSI, R. Witthans, and S. Finestone (.2); emails from and to J. Zagajeski re hard drive (.1); review and analysis of revised discovery tracker and telephone call with R. Witthans re same (.5); telephone call with S. Finestone re discovery issues (.1); review email from K. Finestone re discovery dispute (.1); review emails from S. Finestone and B. Reed regarding further discussions re preference motion scheduling (.1); emails from and to S. Finestone, R. Witthans, and K. Fineman regarding discovery issues (.1). telephone call with same re same (.3); email to R. Witthans re search term dispute (.1); review emails from K. Fineman and S. Finestone re MHC's overly broad discovery requests (.1)	560.00	1.70	952.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
4/12/2022 49648	Ryan Witthans Disc MHC ESI Review, analyze, and organize document production sets; draft charts of document set sources, descriptions, locations, etc.; draft list of follow-up questions and tasks (5.5). Emails and phone calls with MHC counsel and UnitedLex re search term lists, search reports, and additional search terms (0.3).	385.00	5.80	2,233.00	Billable
4/12/2022 49578	Jennifer Hayes Disc MHC ESI Review emails from M. Knutsen and R. Witthans re additional search terms (.1)	560.00	0.10	56.00	Billable
4/13/2022 49650	Ryan Witthans Disc MHC ESI Continue review, analysis, and organization of document production sets; emails and phone calls with team re same (2.6). Emails with MHC counsel and UnitedLex re additional search terms (0.6). Update privilege terms list based on review of attorney notes following interview of A. Chapin and review of Relativity documents (0.4). Follow-up emails with MHC counsel re third-party document sets, search terms, and MHC internal communications (0.4).	385.00	4.00	1,540.00	Billable
4/13/2022 49659	Jennifer Hayes Disc MHC ESI Further analysis re discovery issues (.2); review multiple emails from M. Knutsen and R. Witthans re same (.1)	560.00	0.30	168.00	Billable
4/15/2022 49681	Ryan Witthans Disc MHC ESI Emails with team re discovery status and forthcoming productions (0.2). Phone call and emails with trustee re same; follow-up phone call with S. Finestone re scope of discovery and third party documents; emails with UnitedLex re HDD delivery; update privilege term list (1.2).	385.00	1.40	539.00	Billable
4/18/2022 49932	Ryan Witthans Disc MHC ESI Emails with UnitedLex and team re external HDD, search terms, privilege terms, and additional documents (0.4). Draft stipulated protective order; emails with team re same (2.1). Review and analyze possible additional document sets; phone call with S. Finestone re same (0.3). Review TCA production and protective order; emails with team re same (0.4).	385.00	3.20	1,232.00	Billable
4/18/2022 49748	Jennifer Hayes Disc MHC ESI Review emails from R. Witthans and K. Everett re revisions to search terms list (.1)	560.00	0.10	56.00	Billable
4/19/2022 49935	Ryan Witthans Disc MHC ESI Emails with team re stipulated protective order; emails and phone call with MHC counsel re same (0.5). Emails with UnitedLex re HDD, search terms,	385.00	1.30	500.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	and privilege terms (0.3). Follow-up emails with UnitedLex and preparation of production plan (0.5).				
4/28/2022 49947	Ryan Witthans Disc MHC ESI Spot check document hits for privilege terms; meeting with UnitedLex re additional privilege review for search term hits; follow-up phone message and email to trustee re same (1.7). Phone call with trustee re same (0.2). Follow-up emails with UnitedLex and opposing counsel re same (0.5).	385.00	2.40	924.00	Billable
4/29/2022 49962	Ryan Witthans Disc MHC ESI Emails with UnitedLex re production status and updates (0.2).	385.00	0.20	77.00	Billable
5/2/2022 50237	Ryan Witthans Disc MHC ESI Emails with UnitedLex and team re production status; research file types; review and analyze MHC's discovery requests (1.1).	385.00	1.10	423.50	Billable
5/2/2022 49999	Jennifer Hayes Disc MHC ESI Review emails from M. Knutsen and R. Witthans regarding hard drive and processing of same (.1); telephone call with S. Finestone re litigation matters and discovery (.1); review emails from K. Fineman and J. Zagajeski re Jomboy subpoena (.1); review further emails from M. Knutsen and R. Witthans re data processing issues (.1); review email from R. Witthans re 5/2 document production and email to S. Finestone re same (.1)	560.00	0.50	280.00	Billable
5/3/2022 49990	Jennifer Hayes Disc MHC ESI Email to R. Witthans re status of document production to MHC (.1); review and respond to email from R. Witthans re same and email to S. Finestone re same (.1); review discovery tracker and further emails from and to R. Witthans re same (.1); emails from and to K. Fineman re subpoenas and subpoena responses (.1)	560.00	0.40	224.00	Billable
5/4/2022 50210	Ryan Witthans Disc MHC ESI Continue download and review of major Benja document production; emails with opposing counsel and follow-up emails with UnitedLex re same (0.8). Emails with TCA counsel, MHC counsel, and team re TCA documents marked confidential; review stipulated protective orders re same; phone call with S. Finestone re same (0.7).	385.00	1.50	577.50	Billable
5/4/2022 50056	Jennifer Hayes Disc MHC ESI Emails from and to R. Witthans, UnitedLex, and S. Finestone re Plaintiff's document production to MHC (.2); review and respond to emails from R. Witthans and R. Michelson re Buerck documents and confidentiality issue (.1)	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/5/2022 50177	Ryan Witthans Disc MHC ESI Review and analyze UnitedLex invoice; emails with J. Hayes re same (0.3).	385.00	0.30	115.50	Billable
5/6/2022 50215	Ryan Witthans Disc MHC ESI Email trustee re UnitedLex invoice (0.1). Review previous invoices; follow-up emails with trustee re same (0.1).	385.00	0.20	77.00	Billable
5/11/2022 50181	Jennifer Hayes Disc MHC ESI Emails from and to M. Knudsen re e-discovery and her unavailability (.1)	560.00	0.10	56.00	Billable
6/7/2022 50685	Ryan Witthans Disc MHC ESI Review and analyze UnitedLex invoice for May 2022; follow-up email to client re same (0.4).	385.00	0.40	154.00	Billable
8/4/2022 52102	Ryan Witthans Disc MHC ESI Review UnitedLex invoice; email to trustee with comments and payment instructions (0.2).	385.00	0.20	77.00	Billable
Total: Disc MHC ESI			115.60		\$50,872.50
<u>Activity: Discovery</u>					
4/9/2021 42493	Ryan Witthans Discovery Discussions with S. Finestone re upcoming document review and case background (0.2).	350.00	0.20	70.00	Billable
4/12/2021 42538	Ryan Witthans Discovery Review discovery documents; emails with team re same (0.3).	350.00	0.30	105.00	Billable
4/14/2021 42616	Ryan Witthans Discovery Emails with AL re review of documents produced in discovery (0.1).	350.00	0.10	35.00	Billable
5/7/2021 43070	S. Finestone Discovery Tel with document handling service re reproduction of documents from SEC and emails re same.	525.00	0.40	210.00	Billable
5/12/2021 43195	S. Finestone Discovery Emails regarding documents from SEC and review of same.	525.00	0.30	157.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/18/2021 44942	S. Finestone Discovery Tel call and emails with counsel for Chapin re 2004 in Peters matter and related issues.	525.00	0.30	157.50	Billable
9/13/2021 45545	S. Finestone Discovery Travel to client's office to review emails and related documents recovered from Chapin computers for production to counsel for Peters and discuss same with client.	525.00	3.70	1,942.50	Billable
9/14/2021 45569	S. Finestone Discovery Further emails with J. Zagejeski re documents to produce to counsel for Peters and continue review of same.	525.00	0.40	210.00	Billable
9/16/2021 45581	S. Finestone Discovery Continue with review of documents to produce to Peters and emails with J. Zagajewski re same.	525.00	1.60	840.00	Billable
9/17/2021 45641	S. Finestone Discovery Continue with document review for production to counsel for Peters prior to 2004 examination; emails with J. Zagajewski re same.	525.00	3.30	1,732.50	Billable
9/18/2021 45648	S. Finestone Discovery Finalize document review and email to M. St. James re production of email discovery concerning communications between debtor and T. Peters.	525.00	1.20	630.00	Billable
10/8/2021 46017	S. Finestone Discovery Additional emails with counsel for Chapin re banking documents	525.00	0.20	105.00	Billable
4/19/2022 49743	Kim Fineman Discovery Research service of process addresses for financial institutions used in the past by EPHE, Benja, and/or Chapin.	450.00	0.90	405.00	Billable
4/19/2022 49760	Jennifer Hayes Discovery Review and analysis of various discovery issues (.2); emails to and from K. Fineman re new bank subpoenas (.1); further emails from and to K. Fineman re same (.1) email to J. Zagajeski re same (.1); telephone call with S. Finestone regarding subpoenas (.1)	560.00	0.60	336.00	Billable
4/20/2022 49786	Kim Fineman Discovery Correspondence with J. Hayes regarding subpoenas for financial records.	450.00	0.30	135.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/20/2022 49795	Kim Fineman Discovery Confer with J. Zagajeski regarding subpoenas to financial institutions.	450.00	0.40	180.00	Billable
4/20/2022 49800	Kim Fineman Discovery Draft notice of subpoenas for service on A. Chapin and Commerce Media Studio LLC.	450.00	0.40	180.00	Billable
4/20/2022 49790	Kim Fineman Discovery Research Commerce Media Studio LLC dba Drews Cards in preparation for drafting subpoena for financial account records.	450.00	0.60	270.00	Billable
4/20/2022 49798	Kim Fineman Discovery Draft subpoena for documents to Bank of America.	450.00	0.80	360.00	Billable
4/20/2022 49799	Kim Fineman Discovery Draft subpoena for documents to PayPal.	450.00	0.80	360.00	Billable
4/20/2022 49792	Kim Fineman Discovery Draft subpoena for documents to San Francisco Federal Credit Union.	450.00	0.90	405.00	Billable
4/21/2022 49940	Ryan Witthans Discovery Emails with TCA counsel re production passwords; review TCA production sets (0.8). Review other sets for confidentiality; research SEC's FOIA confidentiality request requirements (0.5).	385.00	1.30	500.50	Billable
4/21/2022 49789	Kim Fineman Discovery Research records for Silvergate Bank in preparation for potential documents subpoena.	450.00	0.20	90.00	Billable
4/21/2022 49788	Kim Fineman Discovery Correspondence with J. Hayes and S. Finestone regarding records of EPHE Corp.	450.00	0.40	180.00	Billable
4/21/2022 49794	Jennifer Hayes Discovery Review and analysis of bank and Paypal subpoenas (.3); emails from and to K. Fineman re same (.1); review emails from M. Knudsen and R. Witthans re status of processing of external hard drive (.1); review further emails from K. Fineman and J. Zagajeski re subpoenas (.1); legal research re EPHE Corp (.5); emails from and to K. Fineman and S. Finestone re same (.2); further emails from and to K. Fineman re same (.1)	560.00	1.40	784.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/21/2022 49782	S. Finestone Discovery Emails re subpoenas and Ephe payroll records.	560.00	0.20	112.00	Billable
4/22/2022 49817	Kim Fineman Discovery Correspondence with K. Everett regarding additional potential document subpoenas to payment platforms.	450.00	0.10	45.00	Billable
4/22/2022 49813	Kim Fineman Discovery Correspondence with K. Everett regarding document subpoenas to Bank of America, SFFCU and PayPal.	450.00	0.20	90.00	Billable
4/22/2022 49822	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding documents subpoenas to Gusto.	450.00	0.20	90.00	Billable
4/22/2022 49824	Kim Fineman Discovery Revise and finalize Notice of Subpoenas.	450.00	0.70	315.00	Billable
4/22/2022 49826	Kim Fineman Discovery Research corporate records for Gusto in preparation for documents subpoena.	450.00	0.70	315.00	Billable
4/22/2022 49814	Kim Fineman Discovery Revise and finalize document subpoenas to Bank of America, SFFCU, PayPal and Gusto.	450.00	1.60	720.00	Billable
4/22/2022 49809	Kim Fineman Discovery Draft documents subpoena to Gusto.	450.00	0.50	225.00	Billable
4/22/2022 49810	Jennifer Hayes Discovery Review and revise Gusto subpoena (.1); emails from and to K. Fineman re same (.1); review emails from K. Everett re draft subpoenas (.1); review further emails from K. Everett and K. Fineman re same (.1); telephone call with K. Fineman re same (.1); further telephone call with K. Fineman re same (.1)	560.00	0.60	336.00	Billable
4/26/2022 49873	Kim Fineman Discovery Review proofs of service for document subpoenas on Bank of America, PayPal and Gusto.	450.00	0.20	90.00	Billable



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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/26/2022 49897	Kim Fineman Discovery Confer with J. Hayes regarding document subpoenas to additional parties.	450.00	0.20	90.00	Billable
4/26/2022 49912	Kim Fineman Discovery Review proof of service for document subpoena served on San Francisco Federal Credit Union.	450.00	0.10	45.00	Billable
4/26/2022 49911	Kim Fineman Discovery Review and update list of additional potential document subpoenas.	450.00	0.30	135.00	Billable
4/27/2022 49895	Kim Fineman Discovery Research dbas used by A. Chapin.	450.00	0.70	315.00	Billable
4/27/2022 49894	Kim Fineman Discovery Research corporate records for parties for document subpoenas.	450.00	2.40	1,080.00	Billable
4/27/2022 49913	Kim Fineman Discovery Telephone conference with J. Zagajeski regarding background facts for documents subpoenas.	450.00	0.60	270.00	Billable
4/28/2022 49874	Kim Fineman Discovery Draft document subpoena to Jomboy Corp.	450.00	1.90	855.00	Billable
4/29/2022 49878	Kim Fineman Discovery Telephone call from W. Cooper of San Francisco Federal Credit Union regarding documents subpoena.	450.00	0.10	45.00	Billable
4/29/2022 49907	Kim Fineman Discovery Correspondence with J. Zagajeski and K. Everett regarding call from SFFCU representative.	450.00	0.10	45.00	Billable
4/29/2022 49909	Kim Fineman Discovery Prepare subpoena to Jomboy Corp.	450.00	0.20	90.00	Billable
5/1/2022 49970	S. Finestone Discovery Edits to subpoena to Jomboy Media and email re same.	560.00	0.40	224.00	Billable
5/2/2022 49993	Kim Fineman Discovery Revise draft document request for subpoena to Jomboy Corp.	450.00	0.20	90.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/2/2022 49998	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding document subpoena to Jomboy Corp.	450.00	0.30	135.00	Billable
5/2/2022 49984	Jennifer Hayes Discovery Review emails from K, Fineman and J. Zagajeski regarding communications with SF Credit Union re subpoena (.1)	560.00	0.10	56.00	Billable
5/3/2022 50055	Kim Fineman Discovery Research dbas used by A. Chapin.	450.00	0.60	270.00	Billable
5/4/2022 50064	Kim Fineman Discovery Follow up correspondence with J. Zagajeski regarding benjaCoin.	450.00	0.20	90.00	Billable
5/4/2022 50066	Kim Fineman Discovery Research California Secretary of State records for additional corporate entity used by A. Chapin.	450.00	0.20	90.00	Billable
5/4/2022 50034	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding draft document subpoena to Jomboy Corp.	450.00	0.30	135.00	Billable
5/4/2022 50080	Kim Fineman Discovery Call with J. Zagajeski regarding additional corporate entity used by A. Chapin and affiliated dbas.	450.00	0.30	135.00	Billable
5/4/2022 50067	Kim Fineman Discovery Research references to dbas used by A. Chapin in Benja's records.	450.00	0.60	270.00	Billable
5/4/2022 50035	Kim Fineman Discovery Review and analyze white paper and background information regarding benjaCoin.	450.00	0.70	315.00	Billable
5/5/2022 50069	Kim Fineman Discovery Confer with S. Finestone regarding business aliases used by Benja.	450.00	0.20	90.00	Billable
5/5/2022 50057	Kim Fineman Discovery Review and analyze transcript of 2004 examination of T. Goode relating additional business names used by Benja and Chapin.	450.00	1.70	765.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/10/2022 50092	Jennifer Hayes Discovery Review emails from J. Zagajeski and K. Fineman regarding additional subpoenas (.1)	560.00	0.10	56.00	Billable
5/13/2022 50143	Kim Fineman Discovery Attention to document production by Bank of America.	450.00	0.40	180.00	Billable
5/13/2022 50229	Jennifer Hayes Discovery Emails from and to K. Fineman re status of subpoena responses (.1)	560.00	0.10	56.00	Billable
5/14/2022 50169	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding document production from Bank of America.	450.00	0.20	90.00	Billable
5/14/2022 50202	Jennifer Hayes Discovery Emails from and to K. Fineman regarding documents produced by Bank of America (.1)	560.00	0.10	56.00	Billable
5/16/2022 50254	Kim Fineman Discovery Telephone call to W. Cooper of San Francisco Federal Credit Union regarding failure to respond to document subpoena.	450.00	0.10	45.00	Billable
5/16/2022 50259	Kim Fineman Discovery Research contact information for San Francisco Federal Credit Union for inquiry regarding failure to comply with document subpoena.	450.00	0.20	90.00	Billable
5/16/2022 50260	Kim Fineman Discovery Research contact information for PayPal's legal department for inquiry regarding failure to comply with document subpoena.	450.00	0.50	225.00	Billable
5/16/2022 50279	Kim Fineman Discovery Correspondence with M. Heimler of Gusto regarding failure to comply with subpoena for EPHE account records and her request for an extension.	450.00	0.60	270.00	Billable
5/16/2022 50261	Jennifer Hayes Discovery Telephone call with K. Fineman re subpoenas and respondents' failure timely to produce documents (.1)	560.00	0.10	56.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/16/2022 50526	Ryan Witthans Discovery Monitor emails with team re discovery from financial institutions; review account statements (0.8).	385.00	0.80	308.00	Billable
5/17/2022 50273	Kim Fineman Discovery Telephone conference with J. Zagajeski regarding third-party document subpoenas.	450.00	0.50	225.00	Billable
5/18/2022 50302	Kim Fineman Discovery Draft letter to Legal Department of San Francisco Federal Credit Union regarding failure to comply with document subpoena.	450.00	0.40	180.00	Billable
5/18/2022 50310	Kim Fineman Discovery Draft letter to PayPal's Legal Department regarding failure to comply to document subpoena.	450.00	0.70	315.00	Billable
5/20/2022 50319	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding document production by Gusto.	450.00	0.10	45.00	Billable
5/20/2022 50317	Kim Fineman Discovery Correspondence with M. Heimler regarding Gusto document production.	450.00	0.30	135.00	Billable
5/20/2022 50318	Kim Fineman Discovery Review document production by Gusto.	450.00	0.40	180.00	Billable
5/24/2022 50448	Kim Fineman Discovery Draft document subpoenas to third parties.	450.00	1.80	810.00	Billable
5/24/2022 50419	Kim Fineman Discovery Research service addresses for third-party document subpoenas.	450.00	2.30	1,035.00	Billable
5/25/2022 50377	Kim Fineman Discovery Telephone call with B. Bardine of SFFCU regarding response to document subpoena.	450.00	0.10	45.00	Billable
5/25/2022 50379	Kim Fineman Discovery Correspondence with B. Bardine regarding document production by SFFCU.	450.00	0.20	90.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/26/2022 50381	Kim Fineman Discovery Review documents produced by SFFCU.	450.00	0.30	135.00	Billable
5/26/2022 50406	Kim Fineman Discovery Review and research third-parties for document subpoenas in light of existing evidence.	450.00	1.80	810.00	Billable
5/26/2022 50384	Jennifer Hayes Discovery Review and analysis of emails from K. Fineman and J. Zagajeski re Chapin bank records produced in response to subpoena and next steps re same	560.00	0.20	112.00	Billable
6/7/2022 50651	Kim Fineman Discovery Review and revise draft subpoenas to third-parties.	450.00	0.40	180.00	Billable
6/8/2022 50654	Kim Fineman Discovery Review outstanding third-party subpoenas.	450.00	0.60	270.00	Billable
6/8/2022 50656	Jennifer Hayes Discovery Emails from and to K. Fineman regarding scheduling a call to discuss status of subpoenas (.1)	560.00	0.10	56.00	Billable
6/9/2022 50770	Kim Fineman Discovery Confer with J. Hayes regarding status of third-party subpoenas.	450.00	0.40	180.00	Billable
6/9/2022 50660	Jennifer Hayes Discovery Telephone call with K. Fineman re outstanding subpoenas and issues re same (.4)	560.00	0.40	224.00	Billable
6/22/2022 50858	Kim Fineman Discovery Telephone call with J. Zagajeski regarding outstanding third-party subpoenas.	450.00	0.20	90.00	Billable
6/24/2022 50901	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding outstanding third-party subpoenas.	450.00	0.30	135.00	Billable
6/24/2022 50902	Kim Fineman Discovery Review and revise draft third-party subpoenas to payment platforms.	450.00	0.70	315.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/25/2022 51002	Kim Fineman Discovery Review and revise draft third-party subpoenas to financial institutions.	450.00	1.10	495.00	Billable
6/26/2022 51095	Kim Fineman Discovery Review and revise draft third-party subpoenas to stock/coin transfer conduits.	450.00	1.70	765.00	Billable
7/5/2022 51190	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding draft document subpoenas to third-parties.	450.00	0.20	90.00	Billable
7/6/2022 51206	Kim Fineman Discovery Correspondence with J. Zagajeski and K. Everett regarding revisions to third-party document subpoenas.	450.00	0.20	90.00	Billable
7/8/2022 51332	Kim Fineman Discovery Review comments to K. Everett and J. Zagajeski to draft third-party document subpoenas.	450.00	0.60	270.00	Billable
7/11/2022 51319	Jennifer Hayes Discovery Emails from and to K. Fineman re additional subpoenas (.1)	560.00	0.10	56.00	Billable
7/12/2022 51374	Kim Fineman Discovery Review comments by K. Everett and J. Zagajeski to third-party document subpoenas.	450.00	0.50	225.00	Billable
7/13/2022 51386	Kim Fineman Discovery Revise and finalize third-party document subpoenas regarding stock and crypto conduits.	450.00	0.90	405.00	Billable
7/13/2022 51383	Kim Fineman Discovery Revise and finalize third-party document subpoenas to payment platforms.	450.00	1.50	675.00	Billable
7/13/2022 51384	Kim Fineman Discovery Review and revise document subpoenas to financial institutions referenced in Benja's records as receiving transfers.	450.00	2.60	1,170.00	Billable
7/14/2022 51357	Kim Fineman Discovery Prepare notice of third-party document subpoenas for service on counsel for A. Chapin.	450.00	0.30	135.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/14/2022 51358	Kim Fineman Discovery Finalize instructions for process server for third-party document subpoenas.	450.00	1.10	495.00	Billable
7/15/2022 51309	Jennifer Hayes Discovery Review emails from K. Fineman and K. Everett re additional subpoenas (.1)	560.00	0.10	56.00	Billable
7/19/2022 51492	Kim Fineman Discovery Confer with process server regarding service of third-party document subpoenas.	450.00	0.30	135.00	Billable
7/19/2022 51500	Kim Fineman Discovery Review proofs of service for third-party document subpoenas.	450.00	0.30	135.00	Billable
7/19/2022 51528	Kim Fineman Discovery Further research service certain addresses for third-party document subpoenas to banks and update service instructions to reflect.	450.00	0.70	315.00	Billable
7/20/2022 51542	Kim Fineman Discovery Review documents produced by Gemini Exchange in response to third-party document subpoena.	450.00	0.70	315.00	Billable
7/25/2022 51735	Kim Fineman Discovery Confer with J. Hayes regarding document subpoena to Jomboy Corp.	450.00	0.20	90.00	Billable
7/25/2022 51732	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding request for an extension and protective order by Jomboy's counsel.	450.00	0.30	135.00	Billable
7/25/2022 51734	Kim Fineman Discovery Telephone conference with S. Stein, counsel for Jomboy Media, regarding document subpoena and requests for extension and protective order.	450.00	0.30	135.00	Billable
7/25/2022 51720	Kim Fineman Discovery Review documents produced by Gemini Exchange.	450.00	0.70	315.00	Billable
7/25/2022 51635	Jennifer Hayes Discovery Review and analysis of documents produced by Gemini (.8); email to K. Everett and J. Zagajeski re same (.2); review and respond to email from K. Fineman re same (.1); emails from and to J. Zagajeski and K. Everett re same (.1); emails to and from K. Fineman re Ally Bank subpoena (.1); telephone call with K. Fineman re respond from Jonboy's lawyer regarding	560.00	1.50	840.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	subpoena (.2)				
7/26/2022 51808	Ryan Witthans Discovery Emails with K. Fineman re stipulated protective order drafts (0.2).	385.00	0.20	77.00	Billable
7/26/2022 51642	Kim Fineman Discovery Correspondence with K. Everett regarding document subpoena to Jomboy.	450.00	0.20	90.00	Billable
7/26/2022 51650	Kim Fineman Discovery Telephone call to S. Stein regarding document subpoenas to Jomboy Corp.	450.00	0.20	90.00	Billable
7/26/2022 51652	Kim Fineman Discovery Review service information for document subpoena to Citibank.	450.00	0.30	135.00	Billable
7/26/2022 51651	Kim Fineman Discovery Review protective orders.	450.00	0.70	315.00	Billable
7/27/2022 51810	Ryan Witthans Discovery Emails with K. Fineman re stipulated protective orders (0.1).	385.00	0.10	38.50	Billable
7/27/2022 51730	Kim Fineman Discovery Correspondence with S. Stein regarding draft stipulation for protective order.	450.00	0.10	45.00	Billable
7/27/2022 51702	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding objections to document subpoena by Amazon.	450.00	0.20	90.00	Billable
7/27/2022 51700	Kim Fineman Discovery Research corporate records for third-party document subpoena.	450.00	0.40	180.00	Billable
7/27/2022 51701	Kim Fineman Discovery Draft third-party document subpoena to Ally Bank.	450.00	0.60	270.00	Billable
7/27/2022 51714	Kim Fineman Discovery Review and update discovery tracker for third-party document subpoenas.	450.00	0.90	405.00	Billable
7/27/2022 51729	Kim Fineman Discovery Draft proposed stipulation for protective order with Jomboy.	450.00	1.10	495.00	Billable



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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/27/2022 51697	Jennifer Hayes Discovery Emails from and to K. Fineman re status of 15 outstanding subpoenas and analysis re same (.2)	560.00	0.20	112.00	Billable
7/28/2022 51751	Kim Fineman Discovery Review correspondence from Shopify's legal department in response to document subpoena.	450.00	0.70	315.00	Billable
7/29/2022 51762	Kim Fineman Discovery Telephone conference with K. Everett regarding meet and confer with Amazon's counsel regarding document subpoena.	450.00	0.10	45.00	Billable
7/29/2022 51775	Kim Fineman Discovery Correspondence with K. Everett regarding document subpoena to Amazon.	450.00	0.30	135.00	Billable
7/29/2022 51777	Kim Fineman Discovery Correspondence to counsel for Amazon to request meet and confer regarding document subpoena and to provide case background.	450.00	0.30	135.00	Billable
7/29/2022 51776	Kim Fineman Discovery Finalize pleadings for document subpoena to Ally Bank.	450.00	0.80	360.00	Billable
8/1/2022 51895	Kim Fineman Discovery Correspondence with N. Gill, counsel for Amazon, regarding meet and confer on document subpoena.	450.00	0.20	90.00	Billable
8/1/2022 51915	Kim Fineman Discovery Correspondence with Citibank's legal operations team member regarding document subpoena.	450.00	0.30	135.00	Billable
8/2/2022 51879	Kim Fineman Discovery Correspondence with Shopify legal to request meet and confer on document subpoena.	450.00	0.20	90.00	Billable
8/2/2022 51878	Kim Fineman Discovery Meet and confer Zoom conference with N. Gill, attorney for Amazon, regarding document subpoena and her objections thereto.	450.00	0.50	225.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/2/2022 51898	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding meet and confer follow-up with Amazon's counsel.	450.00	0.10	45.00	Billable
8/3/2022 51954	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding email and physical address for document subpoena searches.	450.00	0.30	135.00	Billable
8/3/2022 51957	Kim Fineman Discovery Follow up correspondence with N. Gill, counsel for Amazon, to provide additional documents in support of document requests.	450.00	0.40	180.00	Billable
8/3/2022 51977	Kim Fineman Discovery Review email and physical addresses noted in third-party document productions.	450.00	0.70	315.00	Billable
8/4/2022 51942	Kim Fineman Discovery Follow-up correspondence with N. Gill, counsel for Amazon, regarding updated email and physical address search list.	450.00	0.20	90.00	Billable
8/4/2022 51943	Kim Fineman Discovery Review follow-up correspondence from Shopify's legal department in response to request for meet and confer.	450.00	0.30	135.00	Billable
8/4/2022 51973	Kim Fineman Discovery Update email and physical address list for third-party document subpoenas.	450.00	0.20	90.00	Billable
8/5/2022 51971	Kim Fineman Discovery Correspondence with S. Stein, counsel for Jomboy Corp., regarding draft protective order and production schedule.	450.00	0.30	135.00	Billable
8/7/2022 51983	Kim Fineman Discovery Review and revise pleadings for protective order to reflect comments by Jomboy's counsel.	450.00	0.30	135.00	Billable
8/8/2022 51968	Kim Fineman Discovery Finalize stipulation with Jomboy and proposed protective order for filing.	450.00	0.50	225.00	Billable
8/8/2022 51979	Jennifer Hayes Discovery Telephone call with S. Finestone regarding T. Goode documents and emails from and to S. Finestone re same (.1); telephone call with K.	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Fineman re subpoenas and Jomboy protective order (.1)				
8/9/2022 52020	Kim Fineman Discovery Correspondence with S. Finestone regarding prior communications with R. Mason, Missouri attorney formerly representing Benja, requesting turnover of client files.	450.00	0.10	45.00	Billable
8/9/2022 52018	Kim Fineman Discovery Correspondence with J. Hayes regarding follow up documentation needed from T. Goode.	450.00	0.20	90.00	Billable
8/9/2022 52057	Kim Fineman Discovery Correspondence with K. Everett regarding document subpoena to Silicon Valley Bank.	450.00	0.30	135.00	Billable
8/9/2022 52019	Kim Fineman Discovery Review records in preparation for drafting letters to prior counsel requesting turnover of files.	450.00	0.70	315.00	Billable
8/9/2022 52059	Kim Fineman Discovery Review transcript of 2004 Examination of T. Goode regarding following up documents to be produced.	450.00	0.90	405.00	Billable
8/9/2022 52024	Jennifer Hayes Discovery Emails from and to S. Finestone regarding documents from T. Goode (.1)	560.00	0.10	56.00	Billable
8/9/2022 52034	Jennifer Hayes Discovery Review and analysis of T. Goode document issues (.1); email to K. Fineman re same (.1); further emails from and to K. Fineman re same (.1); review email from K. Everett re Silicon Valley Bank subpoena (.1)	560.00	0.40	224.00	Billable
8/10/2022 52041	Kim Fineman Discovery Confer with J. Zagajeski regarding document subpoena to Silvergate Bank.	450.00	0.20	90.00	Billable
8/10/2022 52044	Kim Fineman Discovery Correspondence with I. Lucas, in-house counsel for Silvergate Bank, regarding third-party document subpoena.	450.00	0.20	90.00	Billable
8/10/2022 52029	Kim Fineman Discovery Telephone conference with I. Lucas of Silvergate Bank regarding refined scope of document production.	450.00	0.30	135.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/10/2022 52053	Kim Fineman Discovery Correspondence with J. Zagajeski and K. Everett regarding records search and document production by Silverseal Bank.	450.00	0.40	180.00	Billable
8/10/2022 52028	Kim Fineman Discovery Review records for additional information to assist in document subpoena to Silvergate Bank.	450.00	0.50	225.00	Billable
8/10/2022 52043	Kim Fineman Discovery Review records of transactions with Silvergate Bank and prepare sample for disclosure to Silvergate Bank to assist in document requests.	450.00	0.50	225.00	Billable
8/10/2022 52062	Jennifer Hayes Discovery Review emails from K. Fineman and K. Everett re Silvergate subpoena updates (.1)	560.00	0.10	56.00	Billable
8/11/2022 52023	Kim Fineman Discovery Correspondence with S. Finestone regarding prior request for turnover of files from attorney R. Mason.	450.00	0.10	45.00	Billable
8/11/2022 52038	Kim Fineman Discovery Correspondence with S. Stein to confirm filing of stipulation for protective order and submission of order.	450.00	0.10	45.00	Billable
8/12/2022 52090	Kim Fineman Discovery Confer with S. Finestone regarding demand letters for client files to former Benja attorneys.	450.00	0.10	45.00	Billable
8/12/2022 52145	Kim Fineman Discovery Correspondence with K. Everett regarding demand letter for client files to former Benja attorneys.	450.00	0.10	45.00	Billable
8/12/2022 52159	Kim Fineman Discovery Email correspondence to S. Stein regarding status of protective order.	450.00	0.10	45.00	Billable
8/12/2022 52088	Kim Fineman Discovery Telephone call to V. Lalla, attorney at Fenwick, regarding request for turn over of client files.	450.00	0.20	90.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/12/2022	Kim Fineman 52092 Discovery Email correspondence to V. Lalla regarding request for turn over of Fenwick's client files for Benja.	450.00	0.20	90.00	Billable
8/12/2022	Kim Fineman 52144 Discovery Correspondence with court regarding status of protective order as to Jomboy Corp.	450.00	0.20	90.00	Billable
8/12/2022	Kim Fineman 52151 Discovery Follow up correspondence with S. Finestone and J. Hayes regarding client files from attorneys formerly representing Benja.	450.00	0.20	90.00	Billable
8/12/2022	Kim Fineman 52153 Discovery Telephone call to J. Kelly and R. Tyz of Tyz Law Group regarding turn over of client files.	450.00	0.20	90.00	Billable
8/12/2022	Kim Fineman 52093 Discovery Email correspondence with J. Kelly and R. Tyz regarding turn over of Tyz Law Group's client files for Benja.	450.00	0.30	135.00	Billable
8/12/2022	Kim Fineman 52091 Discovery Draft letter to V. Lalla of Fenwick requesting turn over of client files.	450.00	0.70	315.00	Billable
8/12/2022	Kim Fineman 52147 Discovery Draft letter to J. Kelly and R. Tyz of Tyz Law Group requesting turn over of client files.	450.00	0.70	315.00	Billable
8/12/2022	Kim Fineman 52168 Discovery Research contact information for Missouri attorney R. Mason for follow up on request for client files.	450.00	0.70	315.00	Billable
8/12/2022	Kim Fineman 52089 Discovery Draft letter to R. Mason requesting turn over of client files.	450.00	0.80	360.00	Billable
8/12/2022	Jennifer Hayes 52139 Discovery Review and respond to email from K. Fineman re Tyz firm documents (.1)	560.00	0.10	56.00	Billable
8/15/2022	Kim Fineman 52193 Discovery Review July 27 letter from Amex regarding extension of deadline for document production.	450.00	0.10	45.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/15/2022 52198	Kim Fineman Discovery Review protective order entered by the Court as to Jomboy.	450.00	0.10	45.00	Billable
8/15/2022 52185	Kim Fineman Discovery Telephone conference with I. Lucus, counsel for Silvergate Bank, regarding refined scope of production after meet and confer.	450.00	0.20	90.00	Billable
8/15/2022 52188	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding document subpoena to Jomboy, protective order related thereon and extended deadline for production.	450.00	0.20	90.00	Billable
8/15/2022 52191	Kim Fineman Discovery Correspondence with D. Staab, attorney for BlockFi, regarding third-party document production and request for protective order.	450.00	0.20	90.00	Billable
8/15/2022 52199	Kim Fineman Discovery Correspondence with S. Stein regarding entry of protective order as to Jomboy and confirming extended deadline for document production.	450.00	0.20	90.00	Billable
8/15/2022 52194	Kim Fineman Discovery Correspondence with S. Finestone regarding production of cilent files from law firms formerly representing Benja.	450.00	0.30	135.00	Billable
8/15/2022 52195	Kim Fineman Discovery Review documents supporting subpoena to BlockFi in light of failure to comply.	450.00	0.30	135.00	Billable
8/15/2022 52196	Kim Fineman Discovery Review documents supporting subpoena to BlockFi in light of failure to comply.	450.00	0.30	135.00	Billable
8/15/2022 52187	Kim Fineman Discovery Review and analyze partial production of documents by Jomboy.	450.00	1.70	765.00	Billable
8/15/2022 52192	Kim Fineman Discovery Review and analyze documents produced by Citibank.	450.00	1.70	765.00	Billable
8/15/2022 52178	Jennifer Hayes Discovery Review and analysis of summary of Citibank production (.1); review emails from K. Fineman and J. Zagajeski re same (.1); review and analysis of	560.00	0.80	448.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Jomboy production (.4); review emails from K. Fineman and K. Everett re same (.1); email to S. Finestone re same (.1)				
8/15/2022 52084	S. Finestone Discovery Emails re attorney document production.	560.00	0.20	112.00	Billable
8/16/2022 52258	Kim Fineman Discovery Telephone call from A. Jones regarding document production by Discover.	450.00	0.10	45.00	Billable
8/16/2022 52240	Kim Fineman Discovery Correspondence with N. Gill, counsel for Amazon, regarding proposed two-week extension for production.	450.00	0.20	90.00	Billable
8/16/2022 52247	Kim Fineman Discovery Draft proposed stipulation and protective order for document production by BlockFi.	450.00	0.30	135.00	Billable
8/16/2022 52260	Kim Fineman Discovery Review file and draft notes to file regarding document subpoena to E*Trade in light of failure to timely respond or comply.	450.00	0.30	135.00	Billable
8/16/2022 52257	Kim Fineman Discovery Correspondence with I. Lucas, counsel for Silvergate Bank, confirming two-week extension for production and refined scope.	450.00	0.40	180.00	Billable
8/16/2022 52259	Kim Fineman Discovery Review file and draft notes to file regarding document subpoena to Coinbase in light of failure to timely respond or comply.	450.00	0.40	180.00	Billable
8/16/2022 52252	Kim Fineman Discovery Correspondence with Stripe legal team regarding additional identifying information for accounts subject to document subpoena.	450.00	0.60	270.00	Billable
8/16/2022 52243	Kim Fineman Discovery Review and analyze document production from Coinbase.	450.00	0.70	315.00	Billable
8/16/2022 52248	Kim Fineman Discovery Draft third-party document subpoena to Silicon Valley Bank.	450.00	0.90	405.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/16/2022 52253	Kim Fineman Discovery Review and analyze transfers made to single account at SVB.	450.00	1.20	540.00	Billable
8/16/2022 52242	Kim Fineman Discovery Review and analyze document production from Discover.	450.00	1.30	585.00	Billable
8/16/2022 52205	S. Finestone Discovery Discussion with K. Fineman re discovery against Silicon Valley Bank.	560.00	0.20	112.00	Billable
8/16/2022 52357	Jennifer Hayes Discovery Review emails from K. Fineman regarding documents produced pursuant to subpoenas (.2)	560.00	0.20	112.00	Billable
8/17/2022 52266	Kim Fineman Discovery Follow up correspondence with Synapse legal department regarding empty folder in document production.	450.00	0.20	90.00	Billable
8/17/2022 52256	Kim Fineman Discovery Review and update tracking notes for third-party document subpoenas.	450.00	0.60	270.00	Billable
8/17/2022 52249	Kim Fineman Discovery Draft third-party document subpoena to Silicon Valley Bank.	450.00	0.70	315.00	Billable
8/17/2022 52244	Kim Fineman Discovery Review and analyze document production from Synapse Financial Technologies.	450.00	1.00	450.00	Billable
8/17/2022 52267	Kim Fineman Discovery Review and analyze document production by Stripe.	450.00	1.50	675.00	Billable
8/17/2022 52255	Kim Fineman Discovery Review and analyze documents produced by E*Trade.	450.00	1.70	765.00	Billable
8/17/2022 52337	Jennifer Hayes Discovery Review and analysis of multiple emails from K. Fineman re documents produced from multiple subpoenaed parties (.3)	560.00	0.30	168.00	Billable



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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/18/2022 52251	Kim Fineman Discovery Follow up call to D. Staab regarding draft stipulation and protective order for production by BlockFi.	450.00	0.10	45.00	Billable
8/18/2022 52262	Kim Fineman Discovery Review follow-up correspondence from N. Gill confirming two-week extension of production deadline for Amazon.	450.00	0.10	45.00	Billable
8/18/2022 52239	Kim Fineman Discovery Correspondence with K. Everett regarding document subpoena to Silicon Valley Bank.	450.00	0.20	90.00	Billable
8/19/2022 52250	Kim Fineman Discovery Review and finalize document subpoena to Silicon Valley Bank for service.	450.00	0.60	270.00	Billable
8/21/2022 52304	Jennifer Hayes Discovery Review and respond to email from M. Knutsen re e-discovery storage issues (.1)	560.00	0.10	56.00	Billable
8/22/2022 52313	Kim Fineman Discovery Telephone conference with A. Jones with Discover Product Services regarding invoice for third-party document production.	450.00	0.10	45.00	Billable
8/22/2022 52355	Kim Fineman Discovery Review service information for document subpoena to Silicon Valley Bank.	450.00	0.10	45.00	Billable
Total: Discovery			111.90		\$51,984.00
<u>Activity: Discovery - BB</u>					
2/2/2021 40965	S. Finestone Discovery - BB Emails with counsel for Taco Corp/Buerck re service of order and production of documents (.2); tel call with counsel for T. Goode re production of documents and potential examination dates and email client and creditors re same (.4); conf call with client to discuss ongoing investigation and potential targets (.5); review additional documents/emails from client (.3)	560.00	1.40	784.00	Billable
4/5/2021 42373	S. Finestone Discovery - BB Review client comments to latest draft of protective order and emails re various matters with client	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/6/2021 42388	S. Finestone Discovery - BB Emails with counsel for Buerck re latest changes to stipulation for protective order	560.00	0.10	56.00	Billable
4/19/2021 42834	Amy Leitner Discovery - BB Review and analysis of SEC documents in connection with potential claims against B. Buerck	300.00	2.30	690.00	Billable
4/21/2021 42914	Amy Leitner Discovery - BB Continue with review and analysis of SEC documents in connection with potential claims against B. Buerck	300.00	2.00	600.00	Billable
4/23/2021 42835	Amy Leitner Discovery - BB Continue review and analysis of SEC documents in connection with potential claims against B. Buerck	300.00	4.20	1,260.00	Billable
4/26/2021 42847	Amy Leitner Discovery - BB Continue review and analysis of SEC documents in connection with potential claims against B. Buerck	300.00	2.30	690.00	Billable
4/26/2021 42794	S. Finestone Discovery - BB Discussions with A. Leitner re update on document review from SEC documents	560.00	0.30	168.00	Billable
4/27/2021 42896	Amy Leitner Discovery - BB Continue review and analysis of SEC documents in connection with potential claims against B. Buerck	300.00	4.40	1,320.00	Billable
4/28/2021 42922	Amy Leitner Discovery - BB Continue review and analysis of over 20k discovery documents in preparation for 2004 exam.	300.00	3.60	1,080.00	Billable
5/21/2021 43480	S. Finestone Discovery - BB Continue document review of SEC/Buerck documents.	560.00	1.20	672.00	Billable
7/7/2021 44130	S. Finestone Discovery - BB Tel call with I. Finestone to review Buerck documents and discuss same.	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/3/2021 47194	Ryan Witthans Discovery - BB Receive and process documents from financial institutions and R. Michelson; emails with J. Hayes re same (0.6).	350.00	0.60	210.00	Billable
12/10/2021 47312	Ryan Witthans Discovery - BB Phone call with J. Hayes re receipt of documents related to Buerck mediation; review documents re same (0.2).	350.00	0.20	70.00	Billable
Total: Discovery - BB			23.20		\$7,936.00
Activity: Discovery - MHC					
1/7/2021 40282	S. Finestone Discovery - MHC Emails with counsel for UMB re documents and email client re same.	560.00	0.20	112.00	Billable
10/12/2021 46419	Johnson Lee Discovery - MHC Reviewed adversary proceeding complaint against MHC Financial Services, defendant's answer, prior 2004 examination and production, and scheduling order (0.8).  Began drafting interrogatories to propound on MHC (2.3).	385.00	3.10	1,193.50	Billable
10/15/2021 46420	Johnson Lee Discovery - MHC Began drafting requests for admissions to propound on MHC (1.8).	385.00	1.80	693.00	Billable
10/18/2021 46421	Johnson Lee Discovery - MHC Completed drafts of interrogatories and requests for admissions to MHC, final review and edits (1.2). Communications with J.Hayes re discovery requests (0.2). Prepared requests for production to MHC (1.4).	385.00	2.80	1,078.00	Billable
10/18/2021 46233	Jennifer Hayes Discovery - MHC Email to J. Lee re status of written discovery drafts in MHC (.1); review and respond to email from J. Lee re same and regarding requests for production (.1); emails from and to MHC's counsel re Defendant's first set of written discovery requests (.1); email to K. Everett re same (.1)	525.00	0.40	210.00	Billable
10/20/2021 46276	Jennifer Hayes Discovery - MHC Emails to and from K. Everett re scheduling a call to discuss MHC's written discovery (.1)	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/25/2021 46427	Kim Fineman Discovery - MHC Telephone call with J. Hayes regarding background for discovery requests in MHC Financial adversary proceeding.	425.00	0.30	127.50	Billable
10/25/2021 46429	Kim Fineman Discovery - MHC Review and revise draft Requests for Admission to MHC Financial.	425.00	1.40	595.00	Billable
10/25/2021 46373	Jennifer Hayes Discovery - MHC Telephone call with K. Fineman regarding discovery in MHC adversary proceeding (Plaintiff's and Defendant's) and multiple emails to K. Fineman re same (.3)	525.00	0.30	157.50	Billable
10/25/2021 46298	S. Finestone Discovery - MHC Emails with Randy Pollock (Chapin counsel) re discovery matters and related subjects; email to trustee re same.	560.00	0.20	112.00	Billable
10/26/2021 46439	Kim Fineman Discovery - MHC Review files from prior 2004 examination as to MHC Financial for documents to be included in Requests for Admission.	425.00	0.70	297.50	Billable
10/26/2021 46410	Kim Fineman Discovery - MHC Revise Requests for Admission to MHC Financial.	425.00	1.50	637.50	Billable
10/26/2021 46440	Kim Fineman Discovery - MHC Review and analyze draft set of discovery requests to MHC Financial.	425.00	1.60	680.00	Billable
10/26/2021 46384	Jennifer Hayes Discovery - MHC Telephone call with K. Fineman re status of Plaintiff's draft written discovery, first set (.2); emails from and to S. Finestone re MHC subpoenas (.1)	525.00	0.30	157.50	Billable
10/27/2021 46441	Kim Fineman Discovery - MHC Review and revise draft Interrogatories to MHC Financial.	425.00	1.90	807.50	Billable
10/27/2021 46442	Kim Fineman Discovery - MHC Review and revise draft Requests for Production to MHC Financial.	425.00	2.10	892.50	Billable
10/27/2021 46365	Jennifer Hayes Discovery - MHC Review emails from S. Finestone and K. Everett regarding MHC subpoenas (.1)	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/28/2021 46443	Kim Fineman Discovery - MHC Review and finalize discovery requests to MHC Financial.	425.00	0.90	382.50	Billable
10/28/2021 46426	Jennifer Hayes Discovery - MHC Review and revise set one of Plaintiff's written discovery requests (.7); emails to and from K. Fineman re same (.1); review list of records subpoenaed by MHC and request for copies of documents produced (.1); emails from and to S. Finestone re same (.1); telephone call with K. Fineman re Plaintiff's draft discovery and responding to Defendant's discovery (.1)	525.00	1.10	577.50	Billable
10/29/2021 46431	Kim Fineman Discovery - MHC Revise discovery requests to MHC Financial.	425.00	0.70	297.50	Billable
10/29/2021 46401	Jennifer Hayes Discovery - MHC Review and revise Plaintiff's requests for admission (.7); email to K. Fineman re same (.1); review and revise Plaintiff's requests for production and interrogatories (.4); email to K. Fineman re same (.1); further emails from and to K. Fineman re plaintiff's draft discovery requests (.1); email to K. Fineman re MHC's first set of written discovery (.1); further review and analysis of Plaintiff's draft RFAs and edits to same (.3); further emails from and to K. Fineman re same (.1); emails to and from S. Finestone re Plaintiff's first set of written discovery (.1); further edits to Plaintiff's RFP and Rogs (.2); email to K. Everett re draft discovery (.1); begin reviewing Defendants' written discovery (.4)	525.00	2.70	1,417.50	Billable
11/1/2021 46596	Kim Fineman Discovery - MHC Review discovery requests received from MHC Financial (.4); Correspondence with J. Hayes regarding coordination of responses to same (.2).	425.00	0.60	255.00	Billable
11/1/2021 46560	Jennifer Hayes Discovery - MHC Follow up email to K. Everett re drafts of Plaintiff's first set of written discovery (.1); emails from and to K. Fineman re responses to MHC's written discovery requests (.1); review and respond to email from K. Everett re MHC discovery (.1)	525.00	0.30	157.50	Billable
11/2/2021 46572	Jennifer Hayes Discovery - MHC Emails to and from MHC regarding its written discovery (.1)	525.00	0.10	52.50	Billable
11/4/2021 46582	Jennifer Hayes Discovery - MHC Emails from and to K. Fineman regarding drafting responses to MHC's discovery (.1)	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/5/2021 46653	Kim Fineman Discovery - MHC Draft responses to discovery requests from MHC Financial.	425.00	1.50	637.50	Billable
11/5/2021 46654	Jennifer Hayes Discovery - MHC Emails from and to S. Finestone regarding MHC subpoenas (.1)	525.00	0.10	52.50	Billable
11/8/2021 46667	Kim Fineman Discovery - MHC Draft responses to discovery requests from MHC Financial.	425.00	3.80	1,615.00	Billable
11/8/2021 46683	Jennifer Hayes Discovery - MHC Follow up email to K. Everett regarding draft MHC discovery (.1)	525.00	0.10	52.50	Billable
11/9/2021 46719	Jennifer Hayes Discovery - MHC Emails from and to K. Everett re scheduling a call to discuss drafts of Plaintiff's first set of written discovery (.1); review and respond to email from K. Fineman re draft responses to MHC's first set of written discovery (.1); telephone call with K. Everett re revisions to Plaintiff's draft discovery (.4); review, revise, and finalize same (.9); email to MHC's counsel re same (.1); draft proof of service (.1); telephone call with K. Fineman re Plaintiff's first set of discovery and Plaintiff's responses to MHC's first set of discovery (.3); draft, review and revise discovery tracker (1.2); emails to K. Fineman re same (.1); review list of subpoenaed records (.1); emails to and from K. Everett re same (.1); emails to and from Titan re same (.1); review and respond to email from B. Reed re Plaintiff's first set of written discovery (.1)	525.00	3.70	1,942.50	Billable
11/10/2021 46729	Jennifer Hayes Discovery - MHC Emails from and to K. Fineman re scheduling order question (.1); review and revise draft responses to MHC's interrogatories (.7); email to K. Fineman re same (.1); review and revise draft responses to MHC's requests for production (.4); email to K. Fineman re same (.1)	525.00	1.40	735.00	Billable
11/11/2021 46796	Jennifer Hayes Discovery - MHC Review and revise interrogatory responses (1.3); emails to and from S. Finestone re plea agreement (.1); emails to and from J. Lee re same (.1); emails from and to K. Fineman re same (.1); telephone call with K. Fineman re same and re interrogatory responses (.1); emails from and to K. Fineman re guilty plea and revisions to interrogatory responses (.1)	525.00	1.80	945.00	Billable
11/12/2021 46766	Kim Fineman Discovery - MHC Review and revise responses to discovery requests from MHC Financial to incorporate facts referenced in transcript from criminal case plea hearing.	425.00	2.30	977.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/12/2021 46765	Jennifer Hayes Discovery - MHC Emails from and to K. Fineman regarding revisions to Interrogatory responses (.1)	525.00	0.10	52.50	Billable
11/14/2021 46830	Jennifer Hayes Discovery - MHC MHC: review revised draft of interrogatory responses and responses to requests for production (5); emails to and from S. Finestone re same (.1)	525.00	0.60	315.00	Billable
11/15/2021 46821	Jennifer Hayes Discovery - MHC Review and revise responses to MHC requests for production (.3); emails to S. Finestone and K. Everett re same (.1); emails from and to K. Everett re scheduling a call to discuss same (.1)	525.00	0.50	262.50	Billable
11/16/2021 46855	Jennifer Hayes Discovery - MHC Emails from and to B. Reed re protective order (.1)	525.00	0.10	52.50	Billable
11/16/2021 46843	Jennifer Hayes Discovery - MHC Prepare for all with K. Everett regarding responses to MHC discovery (.1); telephone call with K. Everett re same (.4); email to K. Everett re same (.1); review, revise, and finalize Plaintiff's responses to MHC's RFP's (.4); emails from and to K. Fineman re Plaintiff's discovery responses and mediation brief (.1); draft proof of service (.1); review and revise discovery tracker (.1)	525.00	1.30	682.50	Billable
11/17/2021 46874	Jennifer Hayes Discovery - MHC Review service copies of discovery responses (.1); email to opposing counsel re same (.1); review and respond to B. Reed re timing of production of documents (.1); email to K. Everett re same (.1)	525.00	0.40	210.00	Billable
11/19/2021 46937	Jennifer Hayes Discovery - MHC Review and revise draft stipulated protective order in MHC adversary proceeding (.3); email to K. Everett re same (.1); emails from and to K. Everett re same (.1); email to opposing counsels re same (.1)	525.00	0.60	315.00	Billable
11/22/2021 46921	Jennifer Hayes Discovery - MHC Review and finalize stipulation for protective order (MHC) and order approving same (.2); emails to opposing counsel re same (.1); review and respond to email from B. Reed re same (.1); emails from and to K. Everett re prepping of documents for review prior to production and index of same (.1)	525.00	0.50	262.50	Billable
11/23/2021 46976	Jennifer Hayes Discovery - MHC Emails from and to K. Everett and J. Zagajeski regarding documents and	525.00	0.60	315.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	document review (.2); emails from and to D. Miller regarding stipulated protective order (.1); further emails with J. Zagajeski re documents (.1); meeting with J. Zagajeski re same (.2)				
12/7/2021 47302	Ryan Witthans Discovery - MHC Follow-up emails with Titan Legal Services re electronic production of documents (0.1).	350.00	0.10	35.00	Billable
12/7/2021 47230	Jennifer Hayes Discovery - MHC Review and respond to email from S. Finestone re Busey Bank records (.1); emails from and to S. Finestone regarding Busey Bank contact information (.1); email to Busey's counsel re same (.1); review email from Busey's counsel re consent to payment and emails to K. Everett re same (.1); email response to Busey Bank's counsel re mediation (.1)	525.00	0.50	262.50	Billable
12/14/2021 47342	S. Finestone Discovery - MHC Emails with counsel for investors re MHC subpoena and responses	560.00	0.20	112.00	Billable
12/15/2021 47383	S. Finestone Discovery - MHC Follow-up tel call with S. Soulios re discovery production for subpoenas	560.00	0.30	168.00	Billable
12/16/2021 47435	Jennifer Hayes Discovery - MHC Review and respond to email from B. Reed re requested additional extension of time to respond to Trustee's first set of discovery (.1); emails to and from K. Everett re same (.1); email to B. Reed re same (.1); emails to and from K. Everett re status of sentencing and timing of availability of Benja computers (.1); emails from and to B. Reed regarding 12/17 status conference (.1); prepare for call with B. Reed re status conference and call with B. Reed re same (.3); telephone call with S. Finestone regarding 2004 examination of A. Chapin prior to his prison time (.1); review email from A. Chapin's criminal counsel re issues re sentencing (.1)	525.00	1.00	525.00	Billable
12/30/2021 47631	Jennifer Hayes Discovery - MHC Emails from and to J. Zagajeski regarding computers and hard drive (.1); conversation with J. Zagajeski re same (.1); email to O. Barrueto re timing of pick up of computers for e-discovery expert (.1); emails from and to K. Everett and J. Zagajeski regarding computers in which Chapin asserts an interest (.1)	525.00	0.40	210.00	Billable
3/23/2022 49231	Kim Fineman Discovery - MHC Review correspondence from B. Reed requesting meet and confer on Trustee's objections to Requests for Production.	450.00	0.40	180.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/23/2022 49224	Kim Fineman Discovery - MHC Review discovery responses between the Trustee and MHC in preparation for meet and confer.	450.00	1.20	540.00	Billable
3/23/2022 49182	Jennifer Hayes Discovery - MHC Email to R. Witthans re status of first document production (.1); emails from and to R. Witthans and S. Finestone re same (.2); analysis of further email from B. Reed re discovery dispute and Rule 37 letter (.2); telephone call with R. Witthans re same (.2); further telephone call with R. Witthans re same (.5); email to B. Reed in response to his continued efforts to mischaracterize the facts underlying the discovery dispute (.7); telephone call with K. Fineman and R. Witthans re same (.3); follow up email to K. Fineman and R. Witthans re same (.2); review and analysis of facts admitted and in dispute (.3); review and respond to further email from B. Reed (.1); review emails between B. Reed and K. Fineman re Rule 37 conference (.1)	560.00	2.90	1,624.00	Billable
3/23/2022 49169	S. Finestone Discovery - MHC Review discovery dispute and court docket entry; prepare for discussion of discovery issues at status conference.	560.00	1.00	560.00	Billable
3/24/2022 49232	Kim Fineman Discovery - MHC Confer with R. Witthans regarding preparation of confirming letter following meet and confer with B. Reed.	450.00	0.20	90.00	Billable
3/24/2022 49223	Kim Fineman Discovery - MHC Review draft letter to B. Reed confirming discussions at meet and confer conference.	450.00	0.30	135.00	Billable
3/24/2022 49222	Kim Fineman Discovery - MHC Review correspondence from B. Reed regarding discovery meet and confer meeting and request for some matters to heard by the Court.	450.00	0.40	180.00	Billable
3/24/2022 49227	Kim Fineman Discovery - MHC Review pleadings in preparation for meet and confer conference call with B. Reed, counsel for MHC Financial Services.	450.00	0.80	360.00	Billable
3/24/2022 49228	Kim Fineman Discovery - MHC Telephone conference with B. Reed and R. Witthans to meet and confer regarding Trustee's objection to MHC's First Request for Production of Documents.	450.00	0.90	405.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
3/24/2022 49290	Jennifer Hayes Discovery - MHC Numerous communications with R. Witthans, S. Finestone, and UnitedLex regarding first production of documents and discovery dispute issues (.4); review and analysis of S. Finestone status conference summary and next steps re discovery dispute (.3); review lengthy meet and confer letter from R. Witthans to B. Reed (.2)	560.00	0.90	504.00	Billable
3/24/2022 49237	S. Finestone Discovery - MHC Tel calls with R. Witthans re discovery dispute with MHC and edit discovery meet and confer letter; email with counsel for MHC and court re hearing. (1.0); emails with client regarding status conference and related matters (.2)	560.00	1.20	672.00	Billable
3/28/2022 49374	Ryan Witthans Discovery - MHC Emails with team re discovery dispute letter brief and discovery negotiations; conduct Relativity searches to estimate document production timeline (0.6).	385.00	0.60	231.00	Billable
3/28/2022 49276	Jennifer Hayes Discovery - MHC Telephone call with S. Finestone re discovery dispute with MHC (.1); emails to and from R. Witthans re same (.1); emails to and from R. Witthans regarding document searches for MHC's alleged defenses to preference action (.1)	560.00	0.30	168.00	Billable
3/29/2022 49377	Ryan Witthans Discovery - MHC Emails with team re discovery dispute letter, discovery scope negotiations, and document review (0.2).	385.00	0.20	77.00	Billable
3/30/2022 49378	Ryan Witthans Discovery - MHC Draft discovery dispute letter brief; email to team re same (1.8). Revise letter; circulate to chambers and opposing counsel (0.2). Phone call with J. Hayes re anticipated discovery scope negotiations (0.2).	385.00	2.20	847.00	Billable
3/30/2022 49400	Kim Fineman Discovery - MHC Review draft letter to Judge Montali in response to request for hearing on discovery disputes with MHC Financial.	450.00	0.20	90.00	Billable
3/30/2022 49416	Kim Fineman Discovery - MHC Confer with R. Witthans regarding discovery plan as to MHC.	450.00	0.30	135.00	Billable
3/30/2022 49333	Jennifer Hayes Discovery - MHC Review and analysis of response to MHC's discovery dispute letter (.3); emails from and to R. Witthans and K. Fineman re same (.2); telephone	560.00	0.70	392.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	call with R. Witthans re discovery dispute with MHC and next document searches (.2)				
3/30/2022 49464	S. Finestone Discovery - MHC Emails with client and J. Hayes re follow-up discovery plan and litigation targets.	560.00	0.30	168.00	Billable
3/31/2022 49339	Kim Fineman Discovery - MHC Confer with R. Witthans regarding discovery dispute and document production with MHC Financial.	450.00	0.40	180.00	Billable
3/31/2022 49404	Jennifer Hayes Discovery - MHC Telephone call with S. Finestone re MHC discovery dispute (.1); review email from B. Reed to court re same (.1); email to R. Witthans and K. Fineman regarding drafting a to do list for the MHC litigation and discovery issues (.1); emails from and to S. Finestone and R. Witthans re documents produced by Busey Bank (.1); telephone call with K. Fineman re MHC discovery dispute and next steps re same (.5); email to R. Witthans re 4/7 hearing on discovery dispute (.1); further emails from and to R. Witthans and S. Finestone re same (.1); further emails from and to R. Witthans re Busey Bank documents (.1); emails from and to 4/7 discovery dispute hearing and MSJ rescheduling (.1)	560.00	1.30	728.00	Billable
3/31/2022 49329	S. Finestone Discovery - MHC Emails with counsel for Busey Bank re production of documents that were produced to MHC per subpoena (.2); emails with J. Hayes re court docket text and related matters (.1); emails with client regarding follow up investigation items (.2)	560.00	0.50	280.00	Billable
3/31/2022 49438	Kim Fineman Discovery - MHC Confer with J. Hayes regarding discovery dispute and plan for MHC.	450.00	0.40	180.00	Billable
3/31/2022 49437	Kim Fineman Discovery - MHC Review and analyze factual disputes in MHC adversary proceeding for discovery issues.	450.00	2.70	1,215.00	Billable
4/1/2022 49524	Jennifer Hayes Discovery - MHC Review and respond to emails from K. Fineman and R. Witthans re MHC discovery dispute (.1); review and analysis of chart detailing factual issues in dispute with MHC based on MHC's answer and discovery responses (.2)	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/4/2022 49534	Kim Fineman Discovery - MHC Analyze outstanding production issues from Request for Production from MHC.	450.00	0.40	180.00	Billable
4/4/2022 49707	S. Finestone Discovery - MHC Emails re discovery disputes with MHC	560.00	0.30	168.00	Billable
4/6/2022 49469	S. Finestone Discovery - MHC Emails and discussions re subpoenaed documents and related matters.	560.00	0.70	392.00	Billable
4/7/2022 49666	Ryan Witthans Discovery - MHC Emails with team and phone call with S. Finestone re MHC production sets; organize and review MHC production set (0.6).	385.00	0.60	231.00	Billable
4/8/2022 49685	Ryan Witthans Discovery - MHC Emails with trustee and J. Hayes re discovery status, search terms, and cost list; review and analyze MHC document production; emails with team re same (1.3). Review and analyze third-party document production sets; update production trackers (0.8).	385.00	2.10	808.50	Billable
4/8/2022 49512	Jennifer Hayes Discovery - MHC Review email from K. Everett re third party productions and email to S. Finestone re same (.1); review email from K. Everett re external hard drive and email to R. Witthans re same (.2); emails from and to J. Zagajeski re same (.1)	560.00	0.40	224.00	Billable
4/11/2022 49643	Ryan Witthans Discovery - MHC Review and analyze third-party document production sets; phone call with team re same; update production trackers and organize/review production sets (3.5).	385.00	3.50	1,347.50	Billable
4/11/2022 49586	Kim Fineman Discovery - MHC Confer with S. Finestone, J. Hayes and R. Witthans regarding discovery dispute options for MHC.	450.00	0.30	135.00	Billable
4/11/2022 49584	Kim Fineman Discovery - MHC Confer with R. Witthans regarding status of discovery with MHC and motion for partial summary judgment.	450.00	0.50	225.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/11/2022	Kim Fineman 49573 Discovery - MHC Review and analyze factual disputes relevant to preference claim against MHC.	450.00	0.60	270.00	Billable
4/11/2022	Kim Fineman 49587 Discovery - MHC Summarize most problematic discovery requests by MHC in preparation for continued status conference.	450.00	0.80	360.00	Billable
4/11/2022	S. Finestone 49545 Discovery - MHC Tel call with counsel for MHC re partial motion for summary judgment and related discovery issues.	560.00	0.40	224.00	Billable
4/11/2022	S. Finestone 49546 Discovery - MHC Discussions and emails re discovery issues.	560.00	0.50	280.00	Billable
4/12/2022	Kim Fineman 49671 Discovery - MHC Review MHC's responses to requests for admission to determine if additional factual issues can be narrowed.	450.00	0.40	180.00	Billable
4/13/2022	S. Finestone 49599 Discovery - MHC Discussion with R. Witthans re various discovery issues and document production to MHC	560.00	0.40	224.00	Billable
4/13/2022	S. Finestone 49596 Discovery - MHC Emails with judge's clerk re hearing (.1); emails with counsel for MHC re same and further meet and confer (.1); finalize status conference statement re hearing on partial summary judgment (.5)	560.00	0.70	392.00	Billable
4/14/2022	Ryan Witthans 49655 Discovery - MHC Phone call with S. Finestone re updated privilege search terms and tomorrow's discovery dispute hearing; emails with trustee and team re document sets and search terms (0.9).	385.00	0.90	346.50	Billable
4/14/2022	Jennifer Hayes 49669 Discovery - MHC Telephone call with S. Finestone re MHC discovery issues (.1); review MHC's status conference statement (.1); review lengthy email from R. Witthans re 4/15 status conference (.1)	560.00	0.30	168.00	Billable
4/15/2022	Jennifer Hayes 49697 Discovery - MHC Review emails from UnitedLex and R. Witthans re document production (.1)	560.00	0.10	56.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/18/2022 49615	S. Finestone Discovery - MHC Discussion with R. Witthans re production of documents from Buerck- TCA to MHC and related matters.	560.00	0.30	168.00	Billable
4/19/2022 49728	S. Finestone Discovery - MHC Discuss third-party subpoenas with J. Hayes.	560.00	0.20	112.00	Billable
4/20/2022 49950	Ryan Witthans Discovery - MHC Review and analyze TCA stipulated protective order; contact TCA counsel re production of documents subject to order (2.7). Emails with UnitedLex re status of HDD upload (0.1).	385.00	2.80	1,078.00	Billable
4/20/2022 49775	Jennifer Hayes Discovery - MHC Review emails from and to R. Witthans and R. Michelson re Buerck documents and confidentiality issue (.1); email to K. Fineman re subpoenas (.1); further emails from and to K. Fineman re same (.2)	560.00	0.40	224.00	Billable
4/20/2022 49762	S. Finestone Discovery - MHC Discussions with R. Witthans re production of Buerck/TCA documents and compliance with protective order	560.00	0.20	112.00	Billable
4/25/2022 49845	Jennifer Hayes Discovery - MHC Review and analysis of email from R. Witthans re issue of second protective order (.1); review further emails from K. Everett and R. Witthans re same (.1); telephone call with R. Witthans re status and timing of production of third party documents to MHC (.1)	560.00	0.30	168.00	Billable
4/25/2022 49954	Ryan Witthans Discovery - MHC Emails and phone call with MHC counsel re proposed stipulated protective order draft; review and analyze existing protective orders; emails with team re same (1.1). Follow-up emails with trustee and opposing counsel re same (0.4).	385.00	1.50	577.50	Billable
4/26/2022 49956	Ryan Witthans Discovery - MHC Process third-party document sets for production to MHC; emails with opposing counsel and team re productions (2.7). Follow-up emails re same (0.2). Emails with UnitedLex re document production status and search term results; review results and document sets (0.4).	385.00	3.30	1,270.50	Billable
4/26/2022 49927	Jennifer Hayes Discovery - MHC Review emails from M. Knutsen and R. W iththans re additional processed documents and analysis re same (.2); emails to and from K. Fineman re scheduling a call to discuss additional subpoena (.1); telephone call with	560.00	0.50	280.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	K. Fineman re same (.2)				
4/27/2022 49959	Ryan Witthans Discovery - MHC Emails with MHC counsel re inability to download part of document production; reupload documents to MHC local counsel (0.4).	385.00	0.40	154.00	Billable
5/3/2022 50172	Ryan Witthans Discovery - MHC Update discovery trackers; emails with team re discovery production status (0.2). Emails with UnitedLex and follow-up emails with team re same (0.2). Confirm expiration of previous share link to MHC (0.1). Download and review major Benja production (0.4).	385.00	0.90	346.50	Billable
5/3/2022 49978	S. Finestone Discovery - MHC Review correspondence from counsel for Buerck re discovery dispute and emails re document production	560.00	0.20	112.00	Billable
5/4/2022 50012	S. Finestone Discovery - MHC Discuss response to Buerck re turnover of documents per discovery demand by MHC	560.00	0.20	112.00	Billable
5/19/2022 50314	Jennifer Hayes Discovery - MHC Review email from B. Reed re MHC's document production (.1)	560.00	0.10	56.00	Billable
5/20/2022 50324	Jennifer Hayes Discovery - MHC Review emails from R. Witthans and B. Reed re document production status (.1)	560.00	0.10	56.00	Billable
5/21/2022 50500	Ryan Witthans Discovery - MHC Emails with MHC counsel re production of MHC internal emails, privilege log, and interrogatory responses; update discovery tracker (0.9).	385.00	0.90	346.50	Billable
Total: Discovery - MHC			94.00		\$43,279.50
Activity: Employment					
11/9/2020 38923	S. Finestone Employment Draft employment application and supporting declaration for employment of FH law; email to client re same	525.00	0.60	315.00	Billable
11/11/2020 39025	S. Finestone Employment Review email from client and revise employment application documents per email.	525.00	0.30	157.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
2/4/2021 41024	S. Finestone Employment Draft app for employment as counsel for Ch. 7 trustee and related documents	525.00	0.40	210.00	Billable
1/5/2022 47719	Jennifer Hayes Employment Telephone call with K. Everett re comments to ESI employment agreement (.2); email to J. Holt re same (.1); review and analysis of proposed edits to ESI employment agreement (.2); email to J. Holt re same (.1); further revisions to employment agreement (.2); further email to J. Holt regarding tax issue in employment agreement (.1); research re taxability of services and email to J. Holt re same (.1)	525.00	1.00	525.00	Billable
1/6/2022 47774	Jennifer Hayes Employment Review and revise draft employment agreement of ESI vendor (.1); review email from J. Holt re revised employment agreement and email to K. Everett re same (.1); review and analysis of revised contract (.2); emails to and from K. Everett re same (.1); further emails from and to K. Everett re same (.1); further email to J. Holt re same (.1); telephone call with R. Witthans regarding employment application (.1); further emails from and to J. Holt and K. Everett re execution copy of the employment agreement (.1); multiple further emails re same (.1)	525.00	1.00	525.00	Billable
1/10/2022 47841	Jennifer Hayes Employment Review and revise drafts of UnitedLex employment application, declaration, and order (.3); emails from and to R. Witthans re same (.1); further emails from and to R. Witthans re same (.1)	525.00	0.50	262.50	Billable
1/10/2022 48094	Ryan Witthans Employment Draft application to employ UnitedLex as ESI consultant, supporting declaration, and proposed order; review and analyze case motions and stipulated protective order to incorporate into employment application (2.5).	350.00	2.50	875.00	Billable
1/12/2022 48060	Ryan Witthans Employment Revise UnitedLex employment application papers; emails with client re same (1.0).	350.00	1.00	350.00	Billable
1/12/2022 47915	Jennifer Hayes Employment Review emails from and to R. Witthans and K. Everett re employment application for ESI consultant and revisions to same (.1)	525.00	0.10	52.50	Billable
1/13/2022 48082	Ryan Witthans Employment Further revisions to UnitedLex employment application papers; emails with client re same (0.3).	350.00	0.30	105.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/17/2022 48066	Ryan Witthans Employment Emails with UnitedLex re employment application drafts (0.1).	350.00	0.10	35.00	Billable
1/19/2022 48098	Ryan Witthans Employment Emails with J. Holt/UnitedLex re additional services requested by trustee; emails with J. Hayes re necessary revisions to employment application papers (0.2).	350.00	0.20	70.00	Billable
1/19/2022 48005	Jennifer Hayes Employment Emails from and to R. Witthans re revisions to UnitedLex employment application (.1)	525.00	0.10	52.50	Billable
1/28/2022 48235	Ryan Witthans Employment Emails with J. Hayes re UnitedLex services agreement (0.1).	350.00	0.10	35.00	Billable
1/28/2022 48179	Jennifer Hayes Employment Emails from and to R. Witthans regarding status of UnitedLex employment application (.1)	525.00	0.10	52.50	Billable
1/31/2022 48234	Jennifer Hayes Employment Review revised scope of work document for UnitedLex (.1); emails from and to J. Holt re same (.1); email to R. Witthans re same (.1)	525.00	0.30	157.50	Billable
2/1/2022 48320	Ryan Witthans Employment Review and analyze amended SOW and related emails with UnitedLex; revise application to employ UnitedLex as ESI consultant; emails with team re same (1.2). Follow-up emails with client and UnitedLex re signatures and removal of confidential footers from declaration of R. Reeves; revise order approving employment (0.4).	350.00	1.60	560.00	Billable
2/1/2022 48286	Jennifer Hayes Employment Review revised draft of employment application and declaration (.1); emails from and to R. Witthans re same (.1)	525.00	0.20	105.00	Billable
2/2/2022 48284	Ryan Witthans Employment Remove confidential footer; assemble final employment application, declaration, agreement, and proposed order documents; follow-up emails with UnitedLex and trustee re same (0.4).	350.00	0.40	140.00	Billable
2/3/2022 48507	Ryan Witthans Employment Phone calls and emails with S. Finestone and J. Hayes re description of Mr. Chapin's cooperation in UnitedLex employment application; draft errata	350.00	0.50	175.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	to employment application re same (0.4). Email to trustee re same (0.1).				
2/3/2022 48272	S. Finestone Employment Tel call with R. Witthans re application to employ ESI expert and review corrected application.	525.00	0.40	210.00	Billable
2/8/2022 48439	Ryan Witthans Employment Follow up with trustee re errata to UnitedLex employment application; phone call with J. Hayes re same (0.2). Emails with trustee; revise errata re same (0.2).	350.00	0.40	140.00	Billable
2/10/2022 48446	Ryan Witthans Employment Follow-up email to UnitedLex re approval of employment application (0.1).	350.00	0.10	35.00	Billable
Total: Employment			12.20		\$5,145.00
<u>Activity: Fee App</u>					
8/5/2022 51921	S. Finestone Fee App Initial review of time entries for interim fee application.	560.00	0.30	168.00	Billable
Total: Fee App			0.30		\$168.00
<u>Activity: Investigation</u>					
11/9/2020 38924	S. Finestone Investigation Tel call with Kyle Everett with updates on investigation	525.00	0.30	157.50	Billable
11/10/2020 38983	S. Finestone Investigation Emails with client and reveiw emails with debtor rep re necessary documents.	525.00	0.20	105.00	Billable
11/11/2020 39024	S. Finestone Investigation Discussion with Kyle Everett re avenues of investigation with focus on attorney-client matters.	525.00	0.40	210.00	Billable
11/13/2020 39295	S. Finestone Investigation Tel call with Kyle Everett re various matters	525.00	0.30	157.50	Billable
11/13/2020 39124	S. Finestone Investigation Emails and tel call with Kyle Everett re status of investigation and follow up	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/16/2020 39136	S. Finestone Investigation Conf call with Kyle Everett and Andrew Chapin and counsel for Debtor; follow up call with Mr. Everett	525.00	0.70	367.50	Billable
11/18/2020 39205	S. Finestone Investigation Research past corporate counsel and emails with them regarding chapter 11 case, appointment of trustee and request for info.	525.00	0.40	210.00	Billable
11/19/2020 39249	S. Finestone Investigation Emails with Mark Slater re past representation of debtor and to set up call.	525.00	0.10	52.50	Billable
11/19/2020 39248	S. Finestone Investigation Emails with TYZ law firm (Jennifer Kelly) re document request and request for tel call.	525.00	0.20	105.00	Billable
11/19/2020 39250	S. Finestone Investigation Tel call with Kyle Everett re status of discussions with past counsel and deficiencies in Debtor's SOFA and schedules.	525.00	0.40	210.00	Billable
11/19/2020 39247	S. Finestone Investigation Tel call with Fenwick & West (K. Fritz) regarding status of case and request for documents; follow up email re same.	525.00	0.50	262.50	Billable
11/20/2020 39303	S. Finestone Investigation Tel call with former counsel re investigation into debtor's business	525.00	0.20	105.00	Billable
11/20/2020 39304	S. Finestone Investigation Tel call with Kyle Everett regarding deficiencies in debtor filings and follow up matters.	525.00	0.30	157.50	Billable
11/21/2020 39311	S. Finestone Investigation Review bank statements from Busey Bank April - June 2020; notes to file and email to counsel for Debtor	525.00	0.50	262.50	Billable
11/22/2020 39318	S. Finestone Investigation Emails with debtor's counsel re equity holders and treatment of simple agreements for future equity; review emails from client to debtor re additional missing items.	525.00	0.30	157.50	Billable
11/23/2020 39327	S. Finestone Investigation Tel call with Assistant US Attorneys re arrest of debtor's principal and civil	525.00	1.30	682.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	action (.3); review affidavit in criminal case and civil complaint and email to Kyle Everett re same (.5); tel calls with Kyle re various matters (.5)				
11/24/2020 39353	S. Finestone Investigation Draft letters to prior law firms representing debtor requesting turnover of documents and communications; follow up emails with them.	525.00	0.80	420.00	Billable
11/25/2020 39413	S. Finestone Investigation Tel call with counsel from Vedder Price re turnover of records and communications	525.00	0.30	157.50	Billable
11/30/2020 39479	S. Finestone Investigation Conf call with FBI and US Attorneys with update on status of various proceedings against Debtor's principal and related matters (.3); follow up call with client re same (.2)	525.00	0.50	262.50	Billable
12/1/2020 39508	S. Finestone Investigation Work on letter to Buerck/Taco Corp re preservation of records	525.00	0.40	210.00	Billable
12/2/2020 39553	S. Finestone Investigation Review question outline and edit same for Mr. Everett re questions for following day interview of Mr. Chapin	525.00	0.40	210.00	Billable
12/2/2020 39552	S. Finestone Investigation Conf call with debtor's counsel and criminal counsel for A. Chapin	525.00	0.50	262.50	Billable
12/3/2020 39565	S. Finestone Investigation Emails with attorneys for Chapin/Debtor regarding meeting and need to reschedule due to concerns over 5th amendment issues (.3); review and edit latest draft of questions from client and discuss same with him (.5); follow up emails re same (.2)	525.00	1.00	525.00	Billable
12/4/2020 39616	S. Finestone Investigation Conf call with Kyle Everett and general counsel for Firefly regarding company transactions with debtor	525.00	0.20	105.00	Billable
12/5/2020 39620	S. Finestone Investigation Further research on internet businesses in which Debtor may have an interest.	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/7/2020 39628	S. Finestone Investigation Emails with debtor's counsel re turning over of documents.	525.00	0.20	105.00	Billable
12/7/2020 39629	S. Finestone Investigation Review initial documents received from prior counsel - Fenwick & West	525.00	0.20	105.00	Billable
12/7/2020 39626	S. Finestone Investigation Conf call with counsel for debtor and Mr. Everett re cooperation and responsible individual designation; follow up email re same.	525.00	0.30	157.50	Billable
12/8/2020 39645	S. Finestone Investigation Emails with former counsel to the debtor TYZ re turnover of documents and client files	525.00	0.20	105.00	Billable
12/8/2020 39643	S. Finestone Investigation Tel call with former counsel, Mark Slater, re turnover of documents and emails with debtor's counsel re same.	525.00	0.50	262.50	Billable
12/10/2020 39736	S. Finestone Investigation Emails with counsel for former officer.	525.00	0.10	52.50	Billable
12/14/2020 39813	S. Finestone Investigation Tel call with K. Everett re upcoming call (.3); conf call with counsel for Busey re status of investigation and other matters (.3).	525.00	0.60	315.00	Billable
12/16/2020 39870	S. Finestone Investigation Tel call with former counsel in Missouri - Ryan Mason	525.00	0.30	157.50	Billable
12/17/2020 39885	S. Finestone Investigation Letter to former counsel re turnover of records (.2) and email with Slater Law re same (.1)	525.00	0.30	157.50	Billable
12/31/2020 40180	S. Finestone Investigation Review initial set of documents from prior counsel for corporation - R. Mason and email to client re same.	525.00	0.60	315.00	Billable
1/22/2021 40716	S. Finestone Investigation Emails with former counsel re document production and email with client re same.	525.00	0.20	105.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/25/2021 40745	S. Finestone Investigation Emails with client re recently tracked payment streams.	525.00	0.20	105.00	Billable
1/28/2021 40841	S. Finestone Investigation Review emails with Peters/Kema re payments from debtor and discuss same with K. Everett	525.00	0.40	210.00	Billable
2/7/2021 41117	S. Finestone Investigation Emails with counsel for T. Goode re access to company email suite	525.00	0.10	52.50	Billable
2/8/2021 41124	S. Finestone Investigation Emails with counsel for Chapin	525.00	0.20	105.00	Billable
2/8/2021 41122	S. Finestone Investigation Emails with counsel for Goode (.1); email with counsel for lender that terminated loan (.2); emails with M. Stern and client re document production (.1)	525.00	0.40	210.00	Billable
2/9/2021 41166	S. Finestone Investigation Emails with Gusto regarding obtaining of payroll and related information	525.00	0.20	105.00	Billable
2/9/2021 41164	S. Finestone Investigation Tel call with counsel for Chapin re status of criminal case and potential cooperation	525.00	0.40	210.00	Billable
2/19/2021 41425	S. Finestone Investigation Emails with counsel for SEC and obtain documents provided by SEC; emails with client re same.	525.00	0.30	157.50	Billable
3/2/2021 41660	S. Finestone Investigation Emails with counsel for UMB re download of documents and emails with client re same.	525.00	0.20	105.00	Billable
3/8/2021 41802	S. Finestone Investigation Conf call with client and counsel for Busey, ERevshare and XRC re debrief of Goode deposition and next steps; follow up emails	525.00	0.80	420.00	Billable
3/26/2021 42238	Amy Leitner Investigation read background regarding employee issue, legal research for draft letter.	300.00	3.00	900.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/2/2021 42321	S. Finestone Investigation Emails with SEC re production of documents from SEC; begin review of same and email to K. Everett re production.	525.00	1.10	577.50	Billable
4/3/2021 42342	S. Finestone Investigation Further document review from SEC	525.00	0.80	420.00	Billable
4/21/2021 42695	S. Finestone Investigation Emails with counsel for Chapin re plea deal and anticipated cooperation	525.00	0.20	105.00	Billable
4/21/2021 42698	S. Finestone Investigation Emails with counsel for Kema/Peters re response to demand.	525.00	0.30	157.50	Billable
4/22/2021 42767	S. Finestone Investigation Follow up emails with Chapin's counsel re anticipated cooperation	525.00	0.20	105.00	Billable
5/6/2021 43034	Amy Leitner Investigation Continue to compile documents provided by SEC in preparation for 2004 exam	300.00	6.10	1,830.00	Billable
5/6/2021 43017	S. Finestone Investigation Conf call with attorney for Peters re defense to conveyance claims and initial research re same.	525.00	1.00	525.00	Billable
6/8/2021 43584	S. Finestone Investigation Emails with Chapin re follow up documents.	525.00	0.20	105.00	Billable
6/10/2021 43659	S. Finestone Investigation Review materials from Andrew Chapin regarding loans and repurchase agreement with Peters.	525.00	0.40	210.00	Billable
6/11/2021 43669	S. Finestone Investigation Emails and tel call with counsel for T. Goode re follow up items to 2004 exam.	525.00	0.40	210.00	Billable
6/17/2021 43849	S. Finestone Investigation Emails with Chapin and counsel re various matters.	525.00	0.30	157.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/4/2021 44098	S. Finestone Investigation Draft memo to paralegal re document analysis and follow up assignment.	525.00	0.90	472.50	Billable
7/8/2021 44142	S. Finestone Investigation Conf call with client and A. Chapin re Peters transaction; follow up emails re same.	525.00	1.00	525.00	Billable
7/23/2021 44427	S. Finestone Investigation Email with Kyle Everett regarding review of SEC documents	525.00	0.20	105.00	Billable
8/30/2021 45181	S. Finestone Investigation Emails with AUSA and client re Chapin computer issues.	560.00	0.30	168.00	Billable
8/31/2021 45235	S. Finestone Investigation Tel call with Kyle Everett and Joe Z re forensics on Chapin computer and potential recovery of bitcoin (.4); conference call with Kyle, Joe and assistant US Attorney on related issues and restitution (.4)	525.00	0.80	420.00	Billable
9/1/2021 45345	S. Finestone Investigation Tel call with Kyle and Joe regarding computer issues and document production for Peters examination (.3); emails with Chapin counsel re same (.2)	525.00	0.50	262.50	Billable
10/26/2021 46501	S. Finestone Investigation Emails and conf call with Kyle Everett re emails from Chapin's criminal counsel and follow up areas of inquiry; emails with R. Pollock re request for report to US Attorneys.	525.00	0.80	420.00	Billable
11/1/2021 46528	S. Finestone Investigation Prepare letter to Asst. US Attorney and FBI re questions for Chapin and emails re same.	525.00	0.60	315.00	Billable
11/3/2021 46612	S. Finestone Investigation Emails with counsel for Chapin re restitution issues.	525.00	0.20	105.00	Billable
11/4/2021 46622	S. Finestone Investigation Further emails with AUSA re questions for Chapin	525.00	0.20	105.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/5/2021 46552	S. Finestone Investigation Emails with AUSA re questions for Chapin and restitution issues; review Chapin responses re same.	525.00	0.30	157.50	Billable
11/6/2021 46627	S. Finestone Investigation Emails with AUSA re further interview with Chapin regarding bitcoin issues.	525.00	0.40	210.00	Billable
11/8/2021 46645	S. Finestone Investigation Conf call with AUSA re bitcoin issues and follow up emails re same.	525.00	0.70	367.50	Billable
11/9/2021 46700	S. Finestone Investigation Tel call with AUSA re sentencing and bitcoin issues; tel call with Kyle Everett to review information.	525.00	0.50	262.50	Billable
12/3/2021 47159	S. Finestone Investigation Review documents from AUSA and email to him re same.	525.00	0.20	105.00	Billable
12/6/2021 47169	S. Finestone Investigation Tel calls and emails re matters with Assistant U.S. Attorney.	525.00	0.40	210.00	Billable
12/8/2021 47244	S. Finestone Investigation Conf call with client and A. Chapin regarding access to info.	525.00	0.40	210.00	Billable
12/16/2021 47390	S. Finestone Investigation Numerous emails with counsel for Chapin and client regarding sentencing, restitution, submission to custody and other matters; review sentencing decision	525.00	0.70	367.50	Billable
12/20/2021 47477	S. Finestone Investigation Emails re Chapin issues and restitution matters.	525.00	0.20	105.00	Billable
1/12/2022 47883	S. Finestone Investigation Discussion with Kyle Everett re potential claims against investment bankers	525.00	0.30	157.50	Billable
1/18/2022 47968	S. Finestone Investigation Conf call with Kyle Everett and potential counsel to pursue litigation claims; follow up call with Kyle.	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/19/2022 47979	S. Finestone Investigation Emails with Joe Zagajeski (DSI) re investigation into initial coin offering by Benja and follow up with buyer of Benjacoins	525.00	0.20	105.00	Billable
1/20/2022 47993	S. Finestone Investigation Emails re line of questioning regarding initial coin offering issues and discuss Chapin deposition.	525.00	0.50	262.50	Billable
1/21/2022 48020	S. Finestone Investigation Follow up emails re initial coin offering	525.00	0.10	52.50	Billable
1/24/2022 48038	S. Finestone Investigation Further emails and review additional info re initial coin offering investigation.	525.00	0.30	157.50	Billable
7/27/2022 51680	S. Finestone Investigation Discussions regarding subpoenas to bank and protection order with Jomboy Media	560.00	0.30	168.00	Billable
Total: Investigation			43.40		\$20,758.50
<u>Activity: Lit- Peters</u>					
10/31/2021 46444	Jennifer Hayes Lit- Peters Review and revise Peters complaint (.3); emails from and to S. Finestone re same (.1)	525.00	0.40	210.00	Billable
2/24/2022 48725	Jennifer Hayes Lit- Peters Review emails from M. St. James and S. Finestone re amendment to complaint (.1); telephone call with S. Finestone re same (.1)	560.00	0.20	112.00	Billable
2/25/2022 48716	Jennifer Hayes Lit- Peters Emails from and to S. Finestone regarding stipulation to amend Peters complaint (.1); review and revise same (.2); review and revise order approving stipulation (.1); draft first amended complaint (.4); email to M. St. James re same and re draft stip and order (.1)	560.00	0.90	504.00	Billable
2/28/2022 48714	Jennifer Hayes Lit- Peters Follow up email to M. St. James re stipulation to amend complaint (.1); review and respond to email from M. St. James re same (.1)	560.00	0.20	112.00	Billable
3/1/2022 48698	Jennifer Hayes Lit- Peters Review, revise, and finalize stipulation to file amended complaint (.1); email	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	to M. St. James re same (.1); revise, finalize and upload order approving stipulation (.1)				
3/7/2022 48883	Jennifer Hayes Lit- Peters Review and respond to email from M. St. James re revisions to Peters complaint (.1); review and revise amended complaint (.4); file same (n/c); email to K. Everett re same and re response deadline (.1)	560.00	0.60	336.00	Billable
4/5/2022 49879	Johnson Lee Lit- Peters Call with S.Finestone re drafting of discovery requests to T.Peters (0.1)	385.00	0.10	38.50	Billable
4/14/2022 49884	Johnson Lee Lit- Peters Retrieved and analyzed Trustee's amended complaint and T.Peters' answer for admissions, denials and affirmative defenses (0.6). Reviewed Trustee's discovery requests to MHC Financial re scope of requests (0.3).  Reviewed prior settlement communications and analysis re facts and legal issues in case (0.8).	0.00	1.70	0.00	Billable
4/15/2022 49885	Johnson Lee Lit- Peters Reviewed documents and communications previously obtained from T.Peters in federal investigation of Benja and A.Chapin for facts re content and timing of T.Peters' knowledge, matters for requests for admission and interrogatories, and determine scope of additional discovery requests (1.6). Prepared requests for production (1.8).	385.00	3.40	1,309.00	Billable
4/18/2022 49910	Johnson Lee Lit- Peters Began drafting requests for admission to T.Peters (1.8).	385.00	1.80	693.00	Billable
4/19/2022 49886	Johnson Lee Lit- Peters Continued draft of requests for admission to T.Peters (1.4).	385.00	1.40	539.00	Billable
4/22/2022 49905	Johnson Lee Lit- Peters Final edits to and review of requests for production and admission to T.Peters (0.5).  Communication to S.Finestone re discovery requests to T.Peters (0.1).  Prepare draft of interrogatories to T.Peters (1.8).	385.00	2.40	924.00	Billable
4/24/2022 49888	Johnson Lee Lit- Peters Completed and reviewed draft interrogatories to T.Peters (1.0).	385.00	1.00	385.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
4/25/2022 49889	Johnson Lee Lit- Peters Communication to S.Finestone re interrogatories and context of discovery (0.3).  Received and reviewed S.Finestone's comments and edits on discovery requests to T.Peters (0.2). Incorporated changes, replied to comments, and revised requests for production (0.5) and requests for admission (0.8).	385.00	1.80	693.00	Billable
4/26/2022 49891	Johnson Lee Lit- Peters Continued review and revision of interrogatories to T.Peters, replied to comments from S.Finestone (1.2). Final review of revised discovery requests to T.Peters (0.4). Communication with S.Finestone re updated versions of discovery requests (0.1).	385.00	1.70	654.50	Billable
4/27/2022 49858	S. Finestone Lit- Peters Tel call with counsel for Peters re possible mediation and email to client re same.	560.00	0.30	168.00	Billable
4/29/2022 49868	S. Finestone Lit- Peters Discuss mediation and other issues with client (.3); Call with counsel for Peters re mediation and related issues (.2); attend status conference in adversary proceeding (.4); post hearing call with client regarding outcome (.3)	560.00	1.20	672.00	Billable
5/2/2022 49988	Jennifer Hayes Lit- Peters Review multiple emails regarding Peters' request for mediation and telephone call with S. Finestone re same (.2)	560.00	0.20	112.00	Billable
5/2/2022 49972	S. Finestone Lit- Peters Emails re draft discovery	560.00	0.10	56.00	Billable
5/3/2022 49973	S. Finestone Lit- Peters Conf call with client to review draft discovery requests (.4); revise and finalize requests per conference and email to defense counsel re same (.5)	560.00	0.90	504.00	Billable
6/1/2022 50463	S. Finestone Lit- Peters Tel call with counsel for Peters re discovery extension and potential settlement (.2); review financial info from counsel for Peters and emails with client re same (.3)	560.00	0.50	280.00	Billable
6/24/2022 50904	Jennifer Hayes Lit- Peters Review docket entry re status conference and email to S. Finestone and R. Witthans re same (.1); telephone call with and texts from and to R.	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Witthans re same (.1)				
6/27/2022 50928	S. Finestone Lit- Peters Emails with M. St. James re trial schedule, discovery and settlement.	560.00	0.20	112.00	Billable
6/28/2022 51005	S. Finestone Lit- Peters Emails with M. St. James re trial schedule.	560.00	0.10	56.00	Billable
6/30/2022 51019	S. Finestone Lit- Peters Email to court clerk re trial schedule.	560.00	0.10	56.00	Billable
7/4/2022 51185	Jennifer Hayes Lit- Peters Review emails from L. Parada and S. Finestone regarding status conference and trial scheduling issues (.1)	560.00	0.10	56.00	Billable
7/19/2022 51411	S. Finestone Lit- Peters Review emails from Peters' counsel re financial matters as part of potential settlement.	560.00	0.30	168.00	Billable
8/4/2022 51858	S. Finestone Lit- Peters Discuss settlement with Michael St. James	560.00	0.20	112.00	Billable
8/16/2022 52201	S. Finestone Lit- Peters Emails with counsel for Peters re settlement proposal and emails with client re same.	560.00	0.30	168.00	Billable
8/16/2022 52363	Jennifer Hayes Lit- Peters Review emails from M. St. James, S. Finestone, and K. Everett re settlement offer (.1)	560.00	0.10	56.00	Billable
Total: Lit- Peters			22.70		\$9,366.00
<u>Activity: Litigation</u>					
12/8/2020 39644	S. Finestone Litigation Emails with SEC counsel re District Court litigation	525.00	0.20	105.00	Billable
12/11/2020 39750	S. Finestone Litigation Prep for and attend meeting with counsel for SEC regarding pending litigation.	525.00	0.80	420.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/15/2020 39822	S. Finestone Litigation Review email from counsel for SEC re waiver of service and related order; complete waiver and return email	525.00	0.40	210.00	Billable
2/9/2021 41163	S. Finestone Litigation Conf call with SEC lawyers regarding status of litigation; investigation of Chapin and exchange of documents and discovery	525.00	0.60	315.00	Billable
2/10/2021 41190	S. Finestone Litigation Review info from SEC and follow up re various matters.	525.00	0.40	210.00	Billable
2/12/2021 41263	S. Finestone Litigation Emails with SEC counsel and review proposed stipulation and other pleadings regarding District Court case.	525.00	0.70	367.50	Billable
2/22/2021 41489	S. Finestone Litigation Review and edit stipulation to extend time for filing of answer to SEC complaint and email SEC counsel re same.	525.00	0.40	210.00	Billable
2/23/2021 41494	S. Finestone Litigation Review email from SEC with draft status conference statement; review and edit same and emails with SEC counsel re filing of same.	525.00	0.50	262.50	Billable
2/24/2021 41502	S. Finestone Litigation Further emails with SEC re upcoming status conf	525.00	0.20	105.00	Billable
2/25/2021 41510	S. Finestone Litigation Prepare notice of appearance in district court SEC litigation; emails with counsel for SEC re case updates.	525.00	0.30	157.50	Billable
2/26/2021 41613	S. Finestone Litigation Emails with counsel for SEC re third party subpoenas, review bank subpoenas and emails with trustee re same.	525.00	0.40	210.00	Billable
3/26/2021 42171	S. Finestone Litigation Conf call with Kyle Everett and attorneys for SEC regarding litigation in Dist Court and related matters.	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/2/2021 42322	S. Finestone Litigation Research potential claims against MHC for avoidance and recovery of payments and discuss same with Kyle Everett	525.00	1.40	735.00	Billable
4/6/2021 42414	Jennifer Hayes Litigation Analysis re fraudulent transfer claims and telephone call with S. Finestone re same (.2)	525.00	0.20	105.00	Billable
4/7/2021 42433	S. Finestone Litigation Review proposed stipulation re protective order from SEC regarding District Court litigation	525.00	0.60	315.00	Billable
4/8/2021 42442	S. Finestone Litigation Complete review of proposed protective order in SEC litigation and email SEC counsel re same.	525.00	0.40	210.00	Billable
5/24/2021 44045	Adam Rosen Litigation Review correspondence and docket sheet regarding possible claims against Kema Partners/Peters	425.00	0.50	212.50	Billable
5/26/2021 44048	Adam Rosen Litigation Draft response to letter from counsel for Peters regarding potential defenses to avoidance claims and research re same.	425.00	2.80	1,190.00	Billable
5/26/2021 43368	S. Finestone Litigation Discussions with A. Rosen re draft of response to counsel for Peters and demand for funds (.4); review case citations on Ponzi scheme cases and section 550 defense (.8)	525.00	1.20	630.00	Billable
5/27/2021 43319	S. Finestone Litigation Discuss draft of letter to counsel for Peters with client (.2); resarch issues discussed and finalize letter (.6); emails with counsel for Peters re same. (.1)	525.00	0.90	472.50	Billable
6/14/2021 43687	S. Finestone Litigation Emails with client to update litigation status regarding MHC and Peters	525.00	0.20	105.00	Billable
6/17/2021 43857	S. Finestone Litigation Settlement discussions with counsel for Peters; emails with K. Everett re same.	525.00	0.50	262.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/22/2021 43879	S. Finestone Litigation Discussions with client re response to offer from T. Peters and discuss same with counsel for Peters.	525.00	0.50	262.50	Billable
6/24/2021 43898	S. Finestone Litigation Tel call with counsel for Peters with additional settlement discussions (.2) and emails with creditors' counsel re updates re same (.1); review correspondence from MHC counsel and email re same (.4).	525.00	0.70	367.50	Billable
6/30/2021 44026	Jennifer Hayes Litigation Telephone call with S. Finestone re litigation list of issues (.1)	525.00	0.10	52.50	Billable
7/7/2021 44129	S. Finestone Litigation Emails with counsel for Peters and tel call with him re settlement and potential 2004 exam of Chapin (.5); review documents from company re repurchase of SAFE interests (.4); discuss same with client (.2)	525.00	1.10	577.50	Billable
7/8/2021 44141	S. Finestone Litigation Conf call with Chapin and counsel regarding transaction with Tom Peters; follow-up emails with Peters' counsel.	525.00	0.70	367.50	Billable
7/12/2021 44269	S. Finestone Litigation Follow up emails related to claims against Peters	525.00	0.20	105.00	Billable
7/14/2021 44290	S. Finestone Litigation Emails with counsel for Peters re status of settlement	525.00	0.10	52.50	Billable
8/5/2021 44790	Jennifer Hayes Litigation Review and respond to email from K. Everett regarding MHC complaint (.1); telephone call with S. Finestone re same (.1); review, revise, and finalize complaint (.9); review local rules regarding AP filing and instructions re same (.2); draft AP cover sheet (.2); email to K. Everett re file-stamped complaint and next steps (.1); emails from and to S. Finestone re same (.1)	525.00	1.70	892.50	Billable
8/9/2021 44766	Jennifer Hayes Litigation Review and revise Wells Fargo and Chase subpoenas (.6); emails from and to K. Everett re same (.1); research re service addresses for subpoenas (.2); communications with One Legal re service of process of subpoenas (.1); email to K. Everett confirming submission of subpoenas for service (.1); review and analysis of deadlines set forth in summons and Order re Initial Disclosures and Discovery Conference (.2)	525.00	1.30	682.50	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/13/2021 44868	Jennifer Hayes Litigation Listen to voicemail from Wells Fargo re subpoena (.1)	525.00	0.10	52.50	Billable
8/23/2021 45073	Jennifer Hayes Litigation Review email from OneLegal re proof of service of Chase subpoena and review same (.1)	525.00	0.10	52.50	Billable
8/25/2021 45108	S. Finestone Litigation Review stipulation/judgment between SEC and Chapin and emails with SEC counsel re same.	525.00	0.40	210.00	Billable
8/27/2021 45164	Jennifer Hayes Litigation Email to B. Reed re scheduling the discovery conference (.1)	525.00	0.10	52.50	Billable
8/27/2021 45172	Jennifer Hayes Litigation Review correspondence from Wells Fargo re subpoena response and timing of production (.1)	525.00	0.10	52.50	Billable
10/15/2021 46177	S. Finestone Litigation Emails with counsel for Peters re status and potential settlement.	525.00	0.10	52.50	Billable
10/17/2021 46197	S. Finestone Litigation Outline of complaint for J. Lee against T. Peters., including background facts and legal theories.	525.00	0.70	367.50	Billable
10/18/2021 46208	S. Finestone Litigation Follow up emails with Johnson Lee re allegations in complaint against T. Peters.	525.00	0.20	105.00	Billable
10/19/2021 46215	S. Finestone Litigation Tel call with counsel for Peters re potential settlement and intention to file complaint	525.00	0.20	105.00	Billable
10/22/2021 46258	S. Finestone Litigation Edits to Peters complaint; research recent case law re transferee issues.	525.00	1.80	945.00	Billable
10/23/2021 46283	S. Finestone Litigation Research case law re initial transferee issues for adv. proceeding against Peters.	525.00	1.00	525.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/27/2021 46513	S. Finestone Litigation Edits to complaint against Peters.	525.00	0.60	315.00	Billable
10/31/2021 46387	S. Finestone Litigation Finalize complaint v. Tom Peters and email to client re same.	525.00	0.40	210.00	Billable
11/2/2021 46545	S. Finestone Litigation Discussions with J. Lee re Peters complaint and related legal issues.	525.00	0.30	157.50	Billable
11/9/2021 46699	S. Finestone Litigation Revisions to Peters complaint and discuss same with Kyle Everett; review depo transcript to confirm testimony over transfer	525.00	0.50	262.50	Billable
11/13/2021 46798	S. Finestone Litigation Finalize Peters complaint for filing.	525.00	0.20	105.00	Billable
12/10/2021 47289	S. Finestone Litigation Emails with counsel for Peters re extension to respond.	525.00	0.10	52.50	Billable
12/26/2021 47542	Jennifer Hayes Litigation Review emails from and to K. Everett and S. Finestone regarding Peters 12(b)(6) motion (.1)	525.00	0.10	52.50	Billable
12/26/2021 47526	S. Finestone Litigation Review Peters motion to dismiss and email client re same.	525.00	0.70	367.50	Billable
12/27/2021 47531	S. Finestone Litigation Discussions with Kyle Everett regarding motion to dismiss and potential additional claims/investigation.	525.00	0.40	210.00	Billable
1/4/2022 47701	S. Finestone Litigation Discussions with Johnson Lee re opposition to Peters motion to dismiss	525.00	0.50	262.50	Billable
1/12/2022 47884	S. Finestone Litigation Emails and initial review of oppositon to Peters' motion to dismiss.	525.00	1.40	735.00	Billable
1/14/2022 47906	S. Finestone Litigation Review and finalize opposition to Peters motion to dismiss adversary proceeding.	525.00	0.70	367.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/17/2022 47947	S. Finestone Litigation Emails re various matters.	525.00	0.20	105.00	Billable
1/24/2022 48039	S. Finestone Litigation Further review of reply brief on Peters' Motion to Dismiss; discuss same with J. Lee.	525.00	1.40	735.00	Billable
1/25/2022 48102	S. Finestone Litigation Review court ruling on motion to dismiss; emails with Kyle Everett re same.	525.00	0.70	367.50	Billable
2/15/2022 48466	Jennifer Hayes Litigation Review and respond to email from S. Finestone re upcoming status conference in Everett v. Peters (.1)	525.00	0.10	52.50	Billable
2/15/2022 48524	S. Finestone Litigation Tel call with counsel for Peters regarding answer and discovery issues.	560.00	0.30	168.00	Billable
2/21/2022 48612	Jennifer Hayes Litigation Review status conference statement filed by M. St. James in Peters litigation (.1); email to S. Finestone re same (.1); review and analysis of complaint (.3); email to S. Finestone re same (.1); review order denying Peters' 12(b)(6) motion (.1); emails from and to J. Zagajeski re data import and scheduling Relativity training session (.1); further emails re same (.1); emails from and to M. Knudsen re data processed from second laptop and details re same (.1)	560.00	1.00	560.00	Billable
2/22/2022 48617	Jennifer Hayes Litigation Review and analysis of draft status conference statement and email to S. Finestone re same (.2); telephone call with S. Finestone re same and re revisions to complaint (.1); review revised status conference statement and telephone call with S. Finestone re same (.1); email to L. Parada re same (.1); review emails to and from M. St. James and K. Everett re status conference and amendment of complaint (.1)	560.00	0.60	336.00	Billable
2/23/2022 48607	S. Finestone Litigation Emails re amendments to Peters complaint and stipulation re same.	560.00	0.10	56.00	Billable
2/23/2022 48594	S. Finestone Litigation Discuss amending complaint with J. Hayes and edit status conf statement to include reference to amended complaint (.4); emails with client and opposing counsel re same (.2).	560.00	0.60	336.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/24/2022 48652	S. Finestone Litigation Draft stipulation and order for amending complaint and email to J. Hayes re same.	560.00	0.40	224.00	Billable
2/25/2022 48715	Jennifer Hayes Litigation Telephone call with K. Everett re today's status conference in Benja v. Peters (.1); prepare for same (.3); attend status conference (1.4); emails from and to K. Everett re continued status conference and email to M. St. James re same (.1); analysis re litigation strategy in Peters and MHC and telephone call with R. Witthans re same (.7)	560.00	2.50	1,400.00	Billable
2/25/2022 48895	S. Finestone Litigation Emails with J. Hayes re form of stipulation and amended complaint in Peters litigation matter.	560.00	0.30	168.00	Billable
4/5/2022 49475	S. Finestone Litigation Discussions with J. Lee regarding discovery to propound on Peters in AP	560.00	0.30	168.00	Billable
4/25/2022 49835	S. Finestone Litigation Edits to discovery requests to propound on defendant and emails with J. Lee re same.	560.00	1.40	784.00	Billable
4/26/2022 49836	S. Finestone Litigation Complete final edits to discovery requests in Peters litigation and email client re same.	560.00	0.70	392.00	Billable
5/12/2022 50228	Jennifer Hayes Litigation Telephone call with S. Finestone re status of Peters and MHC AP's (.1)	560.00	0.10	56.00	Billable
8/16/2022 52334	Jennifer Hayes Litigation Further analysis re Jomboy claims and emails from and to S. Finestone re same (.2)	560.00	0.20	112.00	Billable
Total: Litigation			42.10	\$22,070.00	
<u>Activity: Mediation</u>					
11/5/2021 46637	Jennifer Hayes Mediation Review email from JAMS requesting deposition and email to billing specialist re apparent error in bill (.1); legal research re Trustee's ability to pay mediation fee absent prior court approval (.1)	525.00	0.20	105.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/8/2021 46686	Jennifer Hayes Mediation Emails from and to JAMS regarding mediation fee (.1); legal research regarding procedures re use of cash collateral and local rules re use of estate funds to pay ordinary chapter 7 expenses (.1); email to K. Everett re same (.1); review emails from JAMS and R. Michelson re scheduling a pre-mediation call (.1); email to JAMS and R. Michelson re same (.1); emails from and to K. Everett re mediation issues and payment of mediator fee (.1); emails from and to S. Finestone re same (.1)	525.00	0.70	367.50	Billable
11/9/2021 46740	Jennifer Hayes Mediation Review emails and agreement regarding any rules for mediation brief (.1); telephone call with K. Fineman re mediation brief (.1)	525.00	0.20	105.00	Billable
11/10/2021 46736	Kim Fineman Mediation Review District Court docket of criminal case against A. Chapin regarding plea agreement and scheduled sentencing.	425.00	0.20	85.00	Billable
11/10/2021 46734	Kim Fineman Mediation Review pleadings and draft complaint related to B. Buerck and Taco Corp. in preparation for drafting mediation brief.	425.00	0.90	382.50	Billable
11/10/2021 46735	Kim Fineman Mediation Legal research on recent In re Fox Ortega Enterprises case in preparation for drafting mediation brief.	425.00	1.00	425.00	Billable
11/10/2021 46733	Jennifer Hayes Mediation Emails from and to K. Fineman re Buerck mediation (.1)	525.00	0.10	52.50	Billable
11/11/2021 46771	Kim Fineman Mediation Review transcripts addressing Chapin plea agreement (1.7); Legal research regarding guilty plea as admissible evidence of actual intent to defraud (2.1).	425.00	3.80	1,615.00	Billable
11/11/2021 46769	Jennifer Hayes Mediation Emails from and to JAMS re call with Judge Newsome on 11/12 (.1)	525.00	0.10	52.50	Billable
11/12/2021 46763	Jennifer Hayes Mediation Prepare for and participate in pre-mediation call with Judge Newsome (.3)	525.00	0.30	157.50	Billable
11/15/2021 46823	Kim Fineman Mediation Begin drafting mediation brief related to claims against B. Buerck.	425.00	1.50	637.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/15/2021 46831	Kim Fineman Mediation Review and analyze background facts related to B. Buerck in preparation for drafting mediation brief.	425.00	1.60	680.00	Billable
11/16/2021 46832	Kim Fineman Mediation Draft mediation brief for B. Buerck matter.	425.00	2.10	892.50	Billable
11/16/2021 46846	Jennifer Hayes Mediation Emails to and from K. Fineman re mediation brief (.1)	525.00	0.10	52.50	Billable
11/17/2021 46847	Kim Fineman Mediation Correspondence with J. Hayes regarding exhibits to potentially include in mediation brief.	425.00	0.50	212.50	Billable
11/17/2021 46877	Jennifer Hayes Mediation Email to K. Fineman regarding mediation (following call with Judge Newsome) (.1)	525.00	0.10	52.50	Billable
11/22/2021 46925	Kim Fineman Mediation Revise mediation brief.	425.00	0.70	297.50	Billable
11/30/2021 47035	Johnson Lee Mediation Communicated with K.Fineman re B.Buerck's assets (0.1). Reviewed bank statements and notes, and began memo re B.Buerck's income and real property (1.0).	385.00	1.10	423.50	Billable
11/30/2021 47002	Kim Fineman Mediation Confer with J. Hayes regarding Buerck mediation brief.	425.00	0.10	42.50	Billable
11/30/2021 47001	Kim Fineman Mediation Correspondence with J. Lee regarding evidence from review of B. Buerck's bank records.	425.00	0.20	85.00	Billable
12/1/2021 47670	Johnson Lee Mediation Continued analysis of bank statements and draft of memo re B.Buerck's income sources, home improvements and expenditures, transfers from Benja, various accounts and transfers in between them (4.3).	385.00	4.30	1,655.50	Billable
12/1/2021 47149	Jennifer Hayes Mediation Emails from and to K. Everett regarding Buerck mediation statement (.1)	525.00	0.10	52.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
12/2/2021 47646	Johnson Lee Mediation Completed and checked memo re B.Buerck's income and expenditures, transfers into and between personal and Taco Corp. accounts, and prepared supporting bank statements (0.4); follow-up communications with K.Fineman re memo, bank statements, and prior SEC production (0.4).	385.00	0.80	308.00	Billable
12/2/2021 47144	Kim Fineman Mediation Review summary of evidence from B. Buerck's bank statements for mediation preparation.	425.00	0.70	297.50	Billable
12/7/2021 47233	Jennifer Hayes Mediation Emails from and to JAMS re mediation fee (.1); emails from and to K. Everett regarding mediation and Busey's question re same (.1); further emails from and to K. Everett re same (.1); email to J. Switzer re same (.1)	525.00	0.40	210.00	Billable
12/7/2021 47222	S. Finestone Mediation Emails re mediation payment and consent from Busey Bank re same.	525.00	0.20	105.00	Billable
12/8/2021 47274	Kim Fineman Mediation Draft mediation brief.	425.00	5.30	2,252.50	Billable
12/8/2021 47276	Jennifer Hayes Mediation Emails from and to J. Switzer and K. Everett re Busey Bank mediation (.1); review and respond to email from K. Fineman re mediation statement and call with Busey Bank (.1); follow up email to K. Everett regarding JAMS mediation fee (.1); review JAMS invoice and emails from and to K. Everett re same (.1)	525.00	0.40	210.00	Billable
12/9/2021 47305	Kim Fineman Mediation Legal research for mediation brief.	425.00	1.60	680.00	Billable
12/9/2021 47315	Kim Fineman Mediation Draft mediation brief.	425.00	3.40	1,445.00	Billable
12/9/2021 47279	Jennifer Hayes Mediation Review email from JAMS re mediation and email to K. Everett re same (.1); respond to email from JAMS re mediation details and logistics (.1); further emails from and to K. Everett and JAMS re same (.1)	525.00	0.30	157.50	Billable
12/9/2021 47259	S. Finestone Mediation Discussions re Buerck mediation	525.00	0.20	105.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/10/2021 47304	Kim Fineman Mediation Review and revise mediation brief.	425.00	1.80	765.00	Billable
12/10/2021 47338	Jennifer Hayes Mediation Review and revise mediation statement (3.3); emails from and to K. Fineman re same (.1); email to K. Everett re same (.1)	525.00	3.50	1,837.50	Billable
12/10/2021 47294	S. Finestone Mediation Review draft mediation statement and edit same; email to J. Hayes re same.	525.00	0.60	315.00	Billable
12/12/2021 47331	Jennifer Hayes Mediation Review and revise mediation brief (.4); emails to and from K. Everett re same (.1); emails to and from K. Fineman re same (.1); email to J. Lee re same (.1)	525.00	0.70	367.50	Billable
12/13/2021 47655	Johnson Lee Mediation Reviewed communication from J.Hayes re mediation brief (0.1). Located and reviewed Benja's Busey Bank statements confirming transfers to B.Buerck/Taco Corp. (0.2), and responded to J.Hayes re details of transfers (0.1).	385.00	0.40	154.00	Billable
12/13/2021 47323	S. Finestone Mediation Emails with attorney for Busey re mediation issues.	525.00	0.20	105.00	Billable
12/13/2021 47352	Jennifer Hayes Mediation Review and respond to email from J. Lee re source of funds paid to Buerck (.1); emails to and from K. Everett re same (.1); review emails from R. Michelson and J. Llamas regarding mediation (.1); review emails from J. Switzer, S. Finestone, and K. Everett re mediation (.1); review JAMS notice re brief submission procedures (.1)	525.00	0.50	262.50	Billable
12/14/2021 47377	Jennifer Hayes Mediation Telephone call with K. Fineman re mediation brief (.1); emails to and from K. Fineman re same (.1)	525.00	0.20	105.00	Billable
12/14/2021 47361	Kim Fineman Mediation Confer with K. Everett on mediation brief.	425.00	0.20	85.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/14/2021 47350	Kim Fineman Mediation Revise and finalize Mediation Brief for submission to JAMS mediator and service.	425.00	1.90	807.50	Billable
12/15/2021 47403	Jennifer Hayes Mediation Emails from and to K. Fineman and R. Michelson regarding mediation and draft of settlement agreement (.1)	525.00	0.10	52.50	Billable
12/16/2021 47466	Jennifer Hayes Mediation Telephone call with K. Fineman regarding mediation (.1); detailed voicemail to R. Michelson re same (.1); telephone call with S. Finestone re failure to receive mediation statement (.1); telephone call with K. Everett re same (.2); email to JAMS re lack of receipt of mediation statement and inquiry re status of payment of mediation fees (.1); email to R. Michelson re missing mediation statement (.1); follow up emails to K. Everett re same and re J. Hayes email to JAMS re same (.1); review email from R. Michelson and emails to and from K. Everett and S. Finestone re same (.2); further email to R. Michelson re mediation statement (.1); review and respond to email from Judge Newsome re pre-mediation call (.1); further emails from and to R. Michelson, K. Everett and S. Finestone re Buerck's mediation statement (.1)	525.00	1.30	682.50	Billable
12/16/2021 47409	Kim Fineman Mediation Confer with J. Hayes regarding draft form of settlement agreement to be circulated, per mediator's direction, prior to mediation.	425.00	0.20	85.00	Billable
12/16/2021 47410	Kim Fineman Mediation Review and analyze Defendants' mediation brief in preparation for drafting settlement agreement form to be circulated prior to mediation.	425.00	0.80	340.00	Billable
12/16/2021 47391	S. Finestone Mediation Review meditation statement submitted by Buerck and emails with Mr. Everett and J. Hayes re arguments in statement and related matters.	525.00	1.10	577.50	Billable
12/17/2021 47457	Kim Fineman Mediation Review correspondence from R. Michelson and J. Hayes regarding mediation statements.	425.00	0.10	42.50	Billable
12/17/2021 47433	Kim Fineman Mediation Further legal research regarding head of household exemption under Florida state law.	425.00	0.30	127.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
12/17/2021 47426	Jennifer Hayes Mediation Review and respond to email from K. Fineman re Buerck's mediation brief (.1); review and respond to email from J. Llamas at JAMS re same (.1); review emails from S. Finestone and K. Everett re mediation (.1)	525.00	0.30	157.50	Billable
12/18/2021 47467	Kim Fineman Mediation Draft proposed form of settlement agreement.	425.00	1.20	510.00	Billable
12/19/2021 47468	S. Finestone Mediation Review additional materials and emails with client and JCH.	525.00	0.40	210.00	Billable
12/19/2021 47448	Kim Fineman Mediation Draft proposed form of settlement agreement for mediation.	425.00	1.40	595.00	Billable
12/19/2021 47436	Jennifer Hayes Mediation Review mediation statement (.5); review case law re Florida head of household exemption (.2); review confidential mediation statement (.2); emails from and to K. Fineman re same (.1); email to K. Everett re same (.1); emails from and to K. Fineman re confidential mediation statement (.2)	525.00	1.30	682.50	Billable
12/20/2021 47487	Jennifer Hayes Mediation Emails from and to K. Everett and S. Finestone regarding Buerck's confidential, supplemental mediation statement (.2); emails to and from R. Newsome regarding this morning's call (.1); prepare for telephone call with R. Newsome (.2); telephone call with S. Finestone re same (.1); telephone call with R. Newsome re mediation (.3); further telephone call with S. Finestone re same (.2); email to K. Everett re call with R. Newsome and pre-mediation questions to be answered (.4); review and respond to email from K. Everett re mediation (.1); emails from and to K. Everett re Buerck's confidential mediation statement (.1); review and revise draft settlement agreement (1.0); email to S. Finestone re same (.1); review and respond to email from K. Everett regarding scheduling a pre-mediation call to discuss issues raised in today's call with Judge Newsome (.1); emails from and to K. Everett re mediation logistics (.1); emails from and to K. Everett and S. Finestone re scheduling a call to discuss issues raised by R. Newsome and telephone call with S. Finestone re same (.2);	525.00	3.20	1,680.00	Billable
12/20/2021 47474	S. Finestone Mediation Discussions and emails re mediation issues (.5); review and redline draft settlement agreement. (.6)	525.00	1.10	577.50	Billable
12/21/2021 47511	Jennifer Hayes Mediation Review and revise draft settlement agreement (.3); emails from and to S. Finestone re same (.1); emails to R. Michelson and K. Everett re same	525.00	11.40	5,985.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	(.1); prepare for mediation (.6); attend mediation re claims against B. Buerck (12.3, bill for 10.3)				
12/21/2021 47492	S. Finestone Mediation Emails re mediation	525.00	0.60	315.00	Billable
12/22/2021 47509	Jennifer Hayes Mediation Email to K. Everett regarding original, fully executed settlement agreement and Buerck declaration (.1); emails from and to S. Finestone re mediation and telephone call with S. Finestone re same (.2); emails from and to K. Everett regarding call with Busey Bank and review email from S. Finestone to creditors' counsel (.1); telephone call with Busey Bank's counsel (.2)	525.00	0.60	315.00	Billable
12/22/2021 47501	S. Finestone Mediation Discussions with K. Everett re settlement with Buerck/Taco Corp; emails with primary creditors re same; discuss same with J. Hayes.	525.00	0.50	262.50	Billable
1/5/2022 47762	Jennifer Hayes Mediation Review email from JAMS regarding additional amount due for Buerck mediation fee and email to K. Everett re same (.1)	525.00	0.10	52.50	Billable
Total: Mediation			69.20		\$32,256.00
Activity: Motion					
1/13/2021 40487	S. Finestone Motion Begin draft of motion to convert case and discuss same with Mr. Everett.	525.00	0.80	420.00	Billable
1/15/2021 40497	S. Finestone Motion Draft motion for order shortening time, supporting declaration and order shortening time.	525.00	1.20	630.00	Billable
1/15/2021 40496	S. Finestone Motion Research and complete draft of motion to convert and supporting declaration and email to client and edit per his comments.	525.00	1.60	840.00	Billable
1/20/2021 40717	S. Finestone Motion Draft notice of hearing and coordinate service of same	525.00	0.60	315.00	Billable
1/29/2021 40848	S. Finestone Motion Prepare for and attend hearing on motion to convert (.5); draft for of order and emails with J. Day at UST re signoff (.2); follow up emails re entry of order and appointment of Mr. Everett as Ch. 7 trustee (.4)	525.00	1.10	577.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
Total: Motion			5.30		\$2,782.50
Activity: Motion - Buerck					
12/26/2021 47547	Jennifer Hayes Motion - Buerck Email to K Fineman re Buerck 9019 motion (.2); review and respond to email from K. Fineman re same (.1)	525.00	0.30	157.50	Billable
12/28/2021 47583	Kim Fineman Motion - Buerck Draft motion to approve compromise.	425.00	1.70	722.50	Billable
12/29/2021 47597	Kim Fineman Motion - Buerck Review and revise 9019 motion and supporting declaration.	425.00	1.20	510.00	Billable
12/29/2021 47596	Kim Fineman Motion - Buerck Draft notice and opportunity for hearing on 9019 motion.	425.00	1.70	722.50	Billable
12/29/2021 47559	Kim Fineman Motion - Buerck Draft declaration of A. Kyle Everett in support of 9019 motion.	425.00	3.50	1,487.50	Billable
12/29/2021 47576	Kim Fineman Motion - Buerck Draft motion to approve compromise with Buerck Parties.	425.00	3.90	1,657.50	Billable
12/29/2021 47577	Jennifer Hayes Motion - Buerck Emails from and to K. Fineman re 9019 motion (.1); review and revise draft of 9019 motion (1.3); review and revise draft of K. Everett declaration in support of 9019 motion (.5)	525.00	1.90	997.50	Billable
12/30/2021 47645	Kim Fineman Motion - Buerck Draft proof of service for notice and opportunity for hearing on Buerck 9019 motion.	425.00	0.70	297.50	Billable
12/30/2021 47642	Kim Fineman Motion - Buerck Legal research to cite check all reference in motion to approve compromise with Buerck Parties.	425.00	1.10	467.50	Billable
12/30/2021 47643	Kim Fineman Motion - Buerck Review and revise pleadings for motion to approve compromise with the Buerck Parties.	425.00	4.20	1,785.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
12/30/2021 47637	Jennifer Hayes Motion - Buerck Emails from and to K. Fineman re revisions to Buerck compromise motion and declaration (.2); review and revise 9019 motion and supporting declaration (1.4); emails to and from K. Fineman re same (.1); begin to review and revise notice of hearing (.2); email to K. Fineman re same (.1); review and analysis of service parties and review and revise mailing matrix (.3); review and revise draft proof of service and email to K. Fineman re same (.1); review and respond to email from K. Fineman re proof of service (.1); email to T. Fraser and K. West requesting permission to serve by email and review and respond to email from K. West and T. Fraser re same (.1); further revisions to 9019 motion and email to K. Fineman re same (.4); review and revise notice and email to K. Fineman re same (.2); further emails from and to K. Fineman re various drafts (.1); email to K. Everett re same (.1); emails from and to R. Michelson regarding Buerck parties' request to review pleadings prior to to filings (.1);	525.00	3.50	1,837.50	Billable
1/3/2022 47741	Jennifer Hayes Motion - Buerck Follow up email to K. Everett regarding Buerck compromise motion (.1); review and respond to email from K. Everett re same (.1); email to R. Michelson re same (.1)	525.00	0.30	157.50	Billable
1/4/2022 47752	Jennifer Hayes Motion - Buerck Review and respond to email from K. Everett re 9019 motion (.1); follow up email to R. Michelson re same (.1); emails from and to R. Michelson re same (.1)	525.00	0.30	157.50	Billable
1/5/2022 47765	Jennifer Hayes Motion - Buerck Telephone call with R. Michelson regarding Mr. Buerck's proposed edits to the motion (.1); review email and voicemail from R. Michelson re same (.1); review and respond to email from R. Michelson re suggested edits to motion, notice, and declaration (.1); email to K. Everett re same (.1); review and analysis of R. Michelson proposed edits to motion and related pleadings and email to K. Everett re same (.2); review and respond to email from K. Everett re same (.1); review and revise notice, motion, and declaration (.6); email to R. Michelson re revised drafts (.1)	525.00	1.40	735.00	Billable
1/6/2022 47736	Jennifer Hayes Motion - Buerck Review and respond to email from R. Michelson re final comments to the Buerck motion (.1); email update to K. Everett (.1); review and respond to email from K. Everett re revisions to his declaration (.1); review, revise, and finalize same and email to K. Everett re same (.1); review and respond to email from R. Michelson re final comments of B. Buerck to draft motion (.1); review, revise, finalize, and file notice, motion, and declaration (.3); email service copy of moving papers to counsel for B. Buerck (.1); review and revise proof of service and finalize and file same (.2, bill for .1); email to Omni Notice re service of notice of hearing by U.S. Mal (.1); review and respond to email from S. Finestone regarding creditor inquiry re 9019	525.00	1.30	682.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	motion (.1); further emails from and to S. Finestone re same (.1)				
1/17/2022 47998	Jennifer Hayes Motion - Buerck Buerck settlement motion - review and analysis of email from investor (M. Birkel) re 9019 motion and respond to same (.6); email to K. Everett re same (.1); emails from and to Omni Noticing re proof of service (.1); review and analysis of same (.1); file same (n/c); review and respond to emails from K. Everett regarding M. Birkel email re 9019 motion (.1)	525.00	1.00	525.00	Billable
2/1/2022 48306	Jennifer Hayes Motion - Buerck Review order approving Buerck settlement and analysis of settlement payment deadline (.1); email to K. Everett re same (.1)	525.00	0.20	105.00	Billable
Total: Motion - Buerck			28.20		\$13,005.00
Activity: Motion - MHC					
2/28/2022 48689	Jennifer Hayes Motion - MHC Begin drafting motion for summary judgment on MHC preference claims (2.3)	560.00	2.30	1,288.00	Billable
3/2/2022 48782	Jennifer Hayes Motion - MHC Draft, review, and revise Everett Declaration in support of motion for partial summary judgment re MHC preferences (2.1)	560.00	2.10	1,176.00	Billable
3/3/2022 48779	Jennifer Hayes Motion - MHC Email to S. Finestone re draft motion for partial summary judgment- MHC preferences (.1)	560.00	0.10	56.00	Billable
3/4/2022 48806	S. Finestone Motion - MHC Begin review of draft of Motion for SJ in MHC matter.	560.00	0.40	224.00	Billable
3/5/2022 48816	S. Finestone Motion - MHC Edits to motion for partial summary judgment in MHC litigation and supporting declaration	560.00	1.50	840.00	Billable
3/7/2022 48856	Jennifer Hayes Motion - MHC Emails from and to S. Finestone re motion for partial summary judgment (.1)	560.00	0.10	56.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/11/2022 49055	Jennifer Hayes Motion - MHC Review and revise motion for partial summary judgment and support Everett declaration (1.9); email to K. Everett re same (.1)	560.00	2.00	1,120.00	Billable
3/14/2022 49044	Jennifer Hayes Motion - MHC Emails to and from K. Everett re scheduling a call to discuss motion for partial summary judgment (.1)	560.00	0.10	56.00	Billable
3/15/2022 49032	Jennifer Hayes Motion - MHC Telephone call with K. Everett re motion for partial summary judgment in MHC (.2); emails to and from K. Everett re same (.1); telephone call with S. Finestone re same and further emails from and to K. Everett re same (.1); further emails from and to K. Everett re his declaration (.1)	560.00	0.50	280.00	Billable
3/16/2022 49131	Jennifer Hayes Motion - MHC Telephone call with R. Witthans re motion for partial summary judgment in the MHC adversary proceeding (.1)	560.00	0.10	56.00	Billable
3/17/2022 49123	Jennifer Hayes Motion - MHC Email to K. Everett re status of draft revisions to motion for partial summary judgment and declaration (.1)	560.00	0.10	56.00	Billable
3/18/2022 49214	Jennifer Hayes Motion - MHC Emails from and to K. Everett re his revisions to the motion for partial summary judgment and declaration (.1); review and analysis of same (.2); review and revise motion and declaration (.3); email to K. Everett re same (.1); further review, revise, and finalize motion for partial summary judgment and supporting declaration (2.6); multiple further communications with K. Everett re same (.2); emails to and from R. Witthans re notice of hearing (.1); review, revise, and finalize same (.2); file pleadings (.2, no charge); email to K. Everett re same (.1)	560.00	3.90	2,184.00	Billable
3/19/2022 49173	Jennifer Hayes Motion - MHC Email to B. Reed re motion for partial summary judgment (.1)	560.00	0.10	56.00	Billable
3/21/2022 49177	Jennifer Hayes Motion - MHC Emails from and to B. Reed re motion for partial summary judgment, status conference, and scheduling a call to discuss next steps (.2); further emails from and to B. Reed re same (.1); emails from and to K. Everett re status conference statements (.1); review and analysis of MHC's status conference statements (.2); email to K. Everett re same (.1); email to MHC's counsel re its status conference statement (.4); email to K. Everett re same (.1); email to R. Witthans re status of document review (.1); emails from and to K. Everett re status of document review and further	560.00	1.90	1,064.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	emails from and to R. Witthans re same (.2); review and analysis of summary of document review status (.2); emails from and to R. Witthans re same (.1); review and respond to email from S. Finestone re status conference and document production (.1)				
3/21/2022 49153	S. Finestone Motion - MHC Review case management statement by MHC and emails with J. Hayes and R. Witthans regarding discovery disputes and pending motion for partial summary judgment	560.00	0.40	224.00	Billable
3/22/2022 49204	Jennifer Hayes Motion - MHC Review and analysis of email from B. Reed re summary judgment motion and discovery issues (.3); email to B. Reed re same (.2); emails to and from B. Reed re scheduling issues re our call to discuss same (.1); telephone call with B. Reed re same (.5); telephone call with S. Finestone re same (.2); review docket order re status conference and email to S. Finestone re same (.1); email to B. Reed re BDRP program (.1)	560.00	1.50	840.00	Billable
3/22/2022 49161	S. Finestone Motion - MHC Discussion with J. Hayes regarding meet and confer with MHC's counsel on issue of continuance of hearing on partial summary judgment motion and court's docket text re same.	560.00	0.30	168.00	Billable
3/25/2022 49240	S. Finestone Motion - MHC Email with Judge's clerk re discovery issues (.1); prepare for and attend status conference (1.0); post conf call with Kyle Everett (.2); email to team re outcome of status conference and upcoming schedule (.2)	560.00	1.40	784.00	Billable
3/26/2022 49310	Jennifer Hayes Motion - MHC Emails from and to K. Everett re scheduling a call to discuss various litigation matters (.1); review and respond to email from K. Everett re same and email re Zoom meeting (.1)	560.00	0.20	112.00	Billable
3/29/2022 49297	Jennifer Hayes Motion - MHC Analysis re various to do items in MHC prior to 4/15 status conference (.3); email to R. Witthans and K. Fineman re same (.1); review emails from R. Witthans and K. Fineman re same (.1)	560.00	0.50	280.00	Billable
4/6/2022 49509	Jennifer Hayes Motion - MHC Review emails from S. Finestone and B. Reed re motion for summary judgment and scheduling of same (.1)	560.00	0.10	56.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/8/2022 49492	Jennifer Hayes Motion - MHC Review emails from S. Finestone and B. Reed re motion for summary judgment and scheduling of same (.1)	560.00	0.10	56.00	Billable
4/12/2022 49559	S. Finestone Motion - MHC Draft status conference statement to update court regarding possible schedule on Motion for PSJ (1.0); review discovery requests in connection with preparation (.2)	560.00	1.20	672.00	Billable
4/13/2022 49635	Jennifer Hayes Motion - MHC Review emails from S. Finestone and L. Parada re summary judgment motion scheduling (.1); review emails from S. Finestone and B. Reed re efforts to agree on a schedule (.1)	560.00	0.20	112.00	Billable
4/14/2022 49606	S. Finestone Motion - MHC Tel call with attorney for MHC re summary judgment timing (.2); review statement filed by MHC (.2); discussions regarding discovery issues and summary judgment schedule with J. Hayes and R. Witthans (.4)	560.00	0.80	448.00	Billable
4/15/2022 49638	Jennifer Hayes Motion - MHC Emails from and to R. Witthans regarding today's hearing on scheduling of motion for partial summary judgment (.1); further emails from and to R. Witthans re same and re discovery issues (.1)	560.00	0.20	112.00	Billable
4/15/2022 49698	S. Finestone Motion - MHC Follow up with R. Witthans re status conf in MHC matter and various discovery issues.	560.00	0.40	224.00	Billable
6/3/2022 50569	Jennifer Hayes Motion - MHC Analysis re MHC's affirmative defenses and anticipated opposition to Plaintiff's motion for partial summary judgment (.6); email to J. Lee re same (.1); review and respond to email from J. Lee re same (.1)	560.00	0.80	448.00	Billable
6/3/2022 51058	Johnson Lee Motion - MHC Communications with J.Hayes re trustee's motion for partial summary judgment and MHC's anticipated opposition (0.1).  Reviewed trustee's complaint for avoidance and recovery of preferential and fraudulent transfers (0.4), and MHC's answer (0.4). Analyzed trustee's motion for partial summary judgment re preferential transfers (0.4). Reviewed docket, status conference statements and case management conference hearing re status of and issues in case (0.6).	385.00	1.90	731.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/6/2022 51059	Johnson Lee Motion - MHC Detailed review of exhibits to trustee's supporting declaration (4.6).	385.00	4.60	1,771.00	Billable
6/7/2022 51117	Johnson Lee Motion - MHC Legal research of Cal. UCC law and choateness doctrine re asserted perfection of security interest (2.8).	385.00	2.80	1,078.00	Billable
6/8/2022 50611	S. Finestone Motion - MHC Research earmarking issues and recent case law re same; emails with J. Lee	560.00	1.50	840.00	Billable
6/9/2022 51118	Johnson Lee Motion - MHC Reviewed recent Chuza Oil decision re earmarking defense to preference claim, and applicability with 9th Circuit law (1.2).	385.00	1.20	462.00	Billable
6/10/2022 51125	Johnson Lee Motion - MHC Retrieved Ninth Circuit case law re earmarking doctrine, and further legal research of cases applying defense (3.2).  Additional analysis of transactions between debtor and defendant and MHC's characterization of transactions as sales, and legal research in relation to antecedent debt (1.7).	385.00	4.90	1,886.50	Billable
6/13/2022 51119	Johnson Lee Motion - MHC Researched and reviewed case law re recoupment, and analyzed transactions between debtor and defendant for applicability of defense (2.7).	385.00	2.70	1,039.50	Billable
6/15/2022 51067	Johnson Lee Motion - MHC Legal research re applicability of a constructive trust under Cal. Civ. Code §§ 2223 and 2224 to funds transferred by debtor to defendant (1.6).	385.00	1.60	616.00	Billable
6/21/2022 50828	Jennifer Hayes Motion - MHC Emails from and to S. Finestone re pending motion for partial summary judgment in MHC litigation (.1)	560.00	0.10	56.00	Billable
6/23/2022 51074	Johnson Lee Motion - MHC Began drafting research memo analyzing MHC's affirmative defenses to trustee's preference avoidance claim (2.0).	385.00	2.00	770.00	Billable
6/24/2022 51126	Johnson Lee Motion - MHC Continued draft of research memo re MHC's affirmative defenses (1.8).	385.00	1.30	500.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/5/2022 51770	Johnson Lee Motion - MHC Supplemented research memo with analysis of potential asserted defense of recoupment and application in 9th Circuit case law (3.2).	385.00	3.20	1,232.00	Billable
7/6/2022 51771	Johnson Lee Motion - MHC Addressed MHC's potential arguments re sales transaction not subject to preference action, contemporaneous exchanges for new value, and subsequent new value in memo (1.8). Researched text, legislative background, and case law re covered payments of supplier arrearages under § 547(j) (1.0), and supplemented memo analyzing inapplicability of MHC's defense to transactions with Benja (0.6).	385.00	3.40	1,309.00	Billable
7/7/2022 51783	Johnson Lee Motion - MHC Revised and supplemented research memo's analysis of earmarking doctrine and constructive trust theories (2.5).	385.00	2.50	962.50	Billable
7/8/2022 51246	Jennifer Hayes Motion - MHC Emails from and to J. Lee regarding MHC defenses (.1)	560.00	0.10	56.00	Billable
7/8/2022 51784	Johnson Lee Motion - MHC Reviewed MHC's affirmative defense asserting perfected security interest by possession of funds and factoring services agreement re assignment and scope of security interest (0.3). Researched UCC and California Commercial Code re perfection of security interest in money, and applicability of § 547(e) to such transfers (0.5).  Legal research for case law re MHC's potential arguments under UCC § 9-313 to preference claim (0.6).  Final review and revisions to research memo re MHC's asserted affirmative defenses and potential arguments to trustee's preference claim (1.3). Communication with J.Hayes re memo (0.1).	385.00	2.80	1,078.00	Billable
7/11/2022 51778	Johnson Lee Motion - MHC Continued legal research re application of § 547(e) to perfection of security interests and applicability to MHC's claim (0.2). Further research and review of case law re MHC's potential argument re perfected security interest under UCC § 9-313 (2.0).	385.00	2.20	847.00	Billable
7/12/2022 51447	S. Finestone Motion - MHC Initial review of research memo re anticipated opposition to motion for summary judgment in MHC matter.	560.00	0.60	336.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/16/2022 51375	Jennifer Hayes Motion - MHC Telephone call with S. Finestone re MHC opposition brief and review emails from S. Finestone and J. Zagajeski re same (.1); begin review and analysis of same (.2); email to S. Finestone re reply brief (.1)	560.00	0.40	224.00	Billable
7/16/2022 51347	S. Finestone Motion - MHC Initial review of MHC opposition to MSJ and email to Kyle Everett re same.	560.00	0.50	280.00	Billable
7/16/2022 51352	S. Finestone Motion - MHC Further emails re opposition and outline of reply	560.00	0.50	280.00	Billable
7/17/2022 51391	S. Finestone Motion - MHC Work on further analysis of opposition to Motion for Summary Judgment and begin memo re same.	560.00	2.10	1,176.00	Billable
7/18/2022 51392	S. Finestone Motion - MHC Continue analysis of opposition and complete memo re same; email to client.	560.00	1.60	896.00	Billable
7/18/2022 51782	Johnson Lee Motion - MHC Analyzed MHC's opposition to motion for partial summary judgment and its asserted defenses (0.6), and objections to evidence (0.1).	385.00	0.70	269.50	Billable
7/19/2022 51412	S. Finestone Motion - MHC Conf call with K. Everett, J. Zagejeski and J. Hayes to analyze opposition to Motion for Summary Judgment and discuss follow up matters for reply.	560.00	1.10	616.00	Billable
7/20/2022 51460	S. Finestone Motion - MHC Emails with client re constructive trust analysis (.2); review spreadsheet/analysis of bank transactions to track flow of MHC funds and source of funds for payments to MHC and emails re same (.4); discuss constructive trust and other affirmative defenses with Johnson Lee (.3); email to J. Hayes and R. Witthans re analysis related to constructive trust (.2)	560.00	1.10	616.00	Billable
7/20/2022 51779	Johnson Lee Motion - MHC Call with S.Finestone re MHC's opposition to trustee's motion for partial summary judgment, and analysis of asserted defenses (0.2).  Reviewed cash flow analysis re tracing of alleged trust property (0.1).	385.00	0.30	115.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/21/2022 51482	S. Finestone Motion - MHC Discuss declaration and constructive trust analysis with client.	560.00	0.30	168.00	Billable
7/21/2022 51477	S. Finestone Motion - MHC Discuss reply brief with J Hayes (.2); edit draft reply brief. (2.5)	560.00	2.70	1,512.00	Billable
7/21/2022 51772	Johnson Lee Motion - MHC Reviewed draft reply to MHC's opposition to motion for partial summary judgment (0.4). Drafted supplemental discussion re tracing requirement under constructive trust theory and application of lowest intermediate balance test in cash flow analysis (0.8). Communication with R.Witthans, J.Hayes, and S.Finestone re draft reply (0.1).	385.00	1.30	500.50	Billable
7/22/2022 51471	S. Finestone Motion - MHC Further review and edits of reply brief, Everett Declaration and evidentiary objections/reply (1.7); discuss same with J. Hayes and Kyle Everett (.4)	560.00	2.10	1,176.00	Billable
7/22/2022 51787	Johnson Lee Motion - MHC Communication with R.Witthans, J.Hayes, and S.Finestone re reply's analysis of antecedent debt and MHC's assertion of perfection of secured status by taking possession of transfers (0.4). Reviewed revised draft of trustee's reply brief to MHC's opposition (0.4).	385.00	0.80	308.00	Billable
7/27/2022 51704	Jennifer Hayes Motion - MHC Begin preparing for hearing on Motion for Partial Summary Judgment (1.1)	560.00	0.90	504.00	Billable
7/28/2022 51747	Jennifer Hayes Motion - MHC Further preparation for summary judgment hearing	560.00	4.20	2,352.00	Billable
7/28/2022 51688	S. Finestone Motion - MHC Emails and tel calls with J. Hayes to prepare for hearing on motion for summary judgment in MHC litigation.	560.00	0.50	280.00	Billable
7/29/2022 51764	Jennifer Hayes Motion - MHC Prepare for (3.6) and attend (.7) hearing on motion for partial summary judgment (4.3 total); follow up communications from and to S. Finestone and R. Witthans re same (.1); telephone call with K. Everett re same (.1)	560.00	4.50	2,520.00	Billable
8/5/2022 51920	S. Finestone Motion - MHC Post hearing discussions with J. Hayes on next steps in MHC litigation.	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/8/2022 51981	Jennifer Hayes Motion - MHC Emails from and to B. Reed regarding order granting summary judgment motion (.1); finalize and upload same (n/c)	560.00	0.10	56.00	Billable
Total: Motion - MHC			88.80		\$42,693.00
<u>Activity: Preference</u>					
6/2/2021 44050	Adam Rosen Preference Draft memo re substantive consolidation and research related to same.	425.00	1.50	637.50	Billable
6/28/2021 44051	Adam Rosen Preference Review response letter from MHC regarding settlement demand for avoidance claims	425.00	0.60	255.00	Billable
7/2/2021 44052	Adam Rosen Preference Emails with S. Finestone regarding response to MHC letter asserting defense to preference claims.	425.00	0.50	212.50	Billable
Total: Preference			2.60		\$1,105.00
<u>Activity: Relief fr. Stay</u>					
11/24/2020 39364	S. Finestone Relief fr. Stay Email to A. Leitner re automatic stay issues and SEC lawsuit and related research assignment.	525.00	0.20	105.00	Billable
12/1/2020 39529	Amy Leitner Relief fr. Stay Research re potential 362 violation questions.	300.00	1.60	480.00	Billable
12/1/2020 39511	S. Finestone Relief fr. Stay Analyze research from A. Leitner regarding automatic stay and SEC litigation; emails re same.	525.00	0.30	157.50	Billable
Total: Relief fr. Stay			2.10		\$742.50
<u>Activity: Settlement</u>					
4/13/2021 42524	S. Finestone Settlement Tel call with Kyle Everett re next steps on various matters; email counsel for MHC re potential settlement talks.	560.00	0.50	280.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/28/2021 42818	S. Finestone Settlement Prep for call (.3) Conf call with counsel for MHC regarding estate's claims against MHC and its potential defenses (.4) and follow up call with K. Everett (.2).; initial follow up research on "earmarking" defense raised by MHC (.5)	525.00	1.40	735.00	Billable
6/3/2021 43553	S. Finestone Settlement Discussion with O. Katz, counsel for Peters re settlement of avoidance claims (.3); follow up research on issues raised by Mr. Katz (.5); emails with client re same (.1)	525.00	0.90	472.50	Billable
6/10/2021 43641	S. Finestone Settlement Tel call and emails with counsel for Peters re settlement	525.00	0.20	105.00	Billable
6/30/2021 44011	S. Finestone Settlement Tel call with counsel for Tom Peters re status of settlement.	525.00	0.30	157.50	Billable
7/6/2021 44110	S. Finestone Settlement Email with counsel for Peters re status of settlement.	525.00	0.10	52.50	Billable
10/19/2021 46238	Jennifer Hayes Settlement Draft settlement demand to Buerck's counsel and email to S. Finestone re same (.2); emails from and to S. Finestone re same (.1); voicemail to R. Michelson re same (.1); email to R. Michelson re same (.1); email to K. Everett re same (.1); telephone call with R. Michelson regarding demand letter (.1)	525.00	0.70	367.50	Billable
10/25/2021 46363	Jennifer Hayes Settlement Discussions with S. Finestone re Buerck/Taco Corp's request for extension of time to respond to demand letter (.1); email to K. Everett re same (.2)	525.00	0.30	157.50	Billable
10/28/2021 46407	Jennifer Hayes Settlement Emails from and to K. Everett re Buerck mediation (.1); further emails from and to K. Everett re same and telephone call with K. Everett re same (.3); telephone call with and emails from and to S. Finestone re mediator (.1); detailed voicemail to R. Michelson re mediator selection and timing (.1); follow up email to R. Michelson re same (.1); email to Judge Newsome's scheduling assistant re request for Judge Newsome's availability to mediate in the first half of December (.1); review and analysis of email from Judge Newsome's scheduling assistant re dates and logistics (.1); email to K. Everett re same (.1); emails from and to K. Everett re mediation scheduling (.1); emails from and to R. Michelson re same (.1)	525.00	1.20	630.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/29/2021 46446	Jennifer Hayes Settlement Email to R. Michelson re mediation dates preferred by Trustee (.1); review email from R. Michelson re proposed mediation date and emails to and from K. Everett re same (.1); emails to R. Michelson and JAMS re same (.1)	525.00	0.30	157.50	Billable
11/1/2021 46598	Jennifer Hayes Settlement Review email from K. Hanley re mediation and email to K. Everett re same (.1); review and respond to email from K. Everett re same and email to K. Hanley re same (.1); further email to K. Everett re same (.1)	525.00	0.30	157.50	Billable
11/2/2021 46585	Jennifer Hayes Settlement Review emails from R. Michelson and K. Handley re mediation (.1); emails from and to S. Finestone re same and review briefing and cancellation schedule (.1)	525.00	0.20	105.00	Billable
11/4/2021 46592	Jennifer Hayes Settlement Review emails from K. Hanley re mediation and review mediation agreement (.1)	525.00	0.10	52.50	Billable
11/8/2021 46646	S. Finestone Settlement Emails re cash collateral issues related to payment of mediation fees.	560.00	0.20	112.00	Billable
1/28/2022 48181	Jennifer Hayes Settlement Draft, review and revise request for entry of order by default, declaration, and order approving settlement agreement with the Buerck parties (.7)	525.00	0.70	367.50	Billable
2/5/2022 48371	Jennifer Hayes Settlement Emails from and to R. Michelson re calculation of payment deadline (.2)	525.00	0.20	105.00	Billable
2/8/2022 48407	Jennifer Hayes Settlement Review voicemail from B. Buerck assistant, T. Guydos, and emails to and from J. Zagajeski re same (.1); telephone call with T. Guydos and email to T. Guydos re timing and instructions for payment of settlement (.2)	525.00	0.30	157.50	Billable
2/11/2022 48489	Jennifer Hayes Settlement Review and respond to email from R. Michelson re scheduling a call to discuss payment due date (.1)	525.00	0.10	52.50	Billable



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3:32 PM

Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/14/2022 48462	Jennifer Hayes Settlement Follow up email to R. Michelson re scheduling a call to discuss payment deadline and review and respond to email from R. Michelson re same (.1)	525.00	0.10	52.50	Billable
2/15/2022 48482	Jennifer Hayes Settlement Telephone call with R. Michelson re settlement payment deadline (.3, bill for .1); telephone call with K. Everett re same (.1); email to R. Michelson re same (.1)	560.00	0.30	168.00	Billable
2/23/2022 48680	Jennifer Hayes Settlement Emails from and to T. Guydos re settlement payment (.1); emails to and from K. Everett and J. Zagajeski re same (.1)	560.00	0.20	112.00	Billable
Total: Settlement			8.60		\$4,557.00
Activity: UST					
12/1/2020 39507	S. Finestone UST Emails with UST and client regarding responsible individual	525.00	0.10	52.50	Billable
12/3/2020 39566	S. Finestone UST Tel call with Jared Day re issues relating to absence of responsible individual (.3); discuss same with client (.2) and email debtor's counsel re same (.1).	525.00	0.60	315.00	Billable
12/9/2020 39712	S. Finestone UST Tel call with J. Day regarding meeting of creditors and related matters and discuss same with client	525.00	0.50	262.50	Billable
1/12/2021 40384	S. Finestone UST Draft stipulation for conversion of case and email to Mr. Everett re same.	525.00	0.50	262.50	Billable
1/13/2021 40486	S. Finestone UST Emails with UST re conversion and related matters (.2); discuss same with Mr. Everett and draft response to inquiries (.3)	525.00	0.50	262.50	Billable
Total: UST			2.20		\$1,155.00
TOTAL	Billable Fees		1031.80		\$479,937.50

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
<u>Activity: Court Call</u>					
12/17/2020 39883	S. Finestone Court Call Court Call Appearance Fee	22.50	1.000	22.50	Billable
Total: Court Call					\$22.50
<u>Activity: Depo. Cost</u>					
11/10/2021 46706	S. Finestone Depo. Cost Deposition Costs for Chapin Depo	410.85	1.000	410.85	Billable
Total: Depo. Cost					\$410.85
<u>Activity: FedEx</u>					
12/14/2021 47357	Kim Fineman FedEx FedEx overnight shipment of Plaintiff's Mediation Brief in Buerck matter to Judge Newsome, JAMS Neutral. Drop Off Receipt No. 775495384157	38.25	1.000	38.25	Billable
Total: FedEx					\$38.25
<u>Activity: Filing</u>					
1/15/2021 40495	S. Finestone Filing Court Filing Fee - motion to convert	15.00	1.000	15.00	Billable
8/5/2021 44751	Jennifer Hayes Filing Court Filing Fee-MHC complaint	350.00	1.000	350.00	Billable
11/13/2021 46797	S. Finestone Filing Court Filing Fee for AP v Peters	350.00	1.000	350.00	Billable
Total: Filing					\$715.00
<u>Activity: LEXIS</u>					
12/1/2020 39518	S. Finestone LEXIS Lexis online computer research	17.80	1.000	17.80	Billable
1/2/2021 40188	S. Finestone LEXIS Lexis online computer research	6.98	1.000	6.98	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
1/2/2021 40189	S. Finestone LEXIS Lexis online computer research	8.58	1.000	8.58	Billable
2/1/2021 40939	S. Finestone LEXIS Lexis online computer research	1.69	1.000	1.69	Billable
4/3/2021 42332	S. Finestone LEXIS Lexis online computer research	11.63	1.000	11.63	Billable
7/2/2021 44074	S. Finestone LEXIS Lexis online computer research	2.53	1.000	2.53	Billable
7/2/2021 44078	S. Finestone LEXIS Lexis online computer research	11.59	1.000	11.59	Billable
8/2/2021 44672	S. Finestone LEXIS Lexis online computer research	66.40	1.000	66.40	Billable
9/1/2021 45337	S. Finestone LEXIS Lexis online computer research	21.52	1.000	21.52	Billable
11/1/2021 46490	S. Finestone LEXIS Lexis online computer research	15.09	1.000	15.09	Billable
12/2/2021 47127	S. Finestone LEXIS Lexis online computer research	7.09	1.000	7.09	Billable
1/2/2022 47679	S. Finestone LEXIS Lexis online computer research	61.03	1.000	61.03	Billable
2/2/2022 48265	S. Finestone LEXIS Lexis online computer research	9.21	1.000	9.21	Billable
4/2/2022 49444	S. Finestone LEXIS Lexis online computer research	22.52	1.000	22.52	Billable
4/2/2022 49443	S. Finestone LEXIS Lexis online computer research	61.48	1.000	61.48	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
5/1/2022 49870	S. Finestone LEXIS Lexis online computer research	11.35	1.000	11.35	Billable
7/2/2022 51136	S. Finestone LEXIS Lexis online computer research	81.12	1.000	81.12	Billable
8/1/2022 51821	S. Finestone LEXIS Lexis online computer research	2.67	1.000	2.67	Billable
8/1/2022 51820	S. Finestone LEXIS Lexis online computer research	17.46	1.000	17.46	Billable
8/1/2022 51822	S. Finestone LEXIS Lexis online computer research	110.63	1.000	110.63	Billable
Total: LEXIS					\$548.37
<u>Activity: Mileage</u>					
12/21/2021 47517	Jennifer Hayes Mileage Travel expense- 44 miles round trip to mediation	0.56	44.000	24.64	Billable
Total: Mileage					\$24.64
<u>Activity: Photocopies</u>					
12/8/2021 47243	S. Finestone Photocopies Copying cost to Titan Legal for subpoena documents	156.66	1.000	156.66	Billable
12/15/2021 47366	S. Finestone Photocopies Copying cost for documents produced by various parties in response to MHC subpoenas	1038.86	1.000	1,038.86	Billable
7/27/2022 51703	Jennifer Hayes Photocopies Copying cost- re hearing on motion for partial summary judgment (MHC)	0.20	248.000	49.60	Billable
7/29/2022 51745	Jennifer Hayes Photocopies Copying cost-print cases for hearing on summary judgment motion	0.20	120.000	24.00	Billable
Total: Photocopies					\$1,269.12

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
<u>Activity: Postage</u>					
11/11/2020 39026	S. Finestone Postage Postage	0.50	1.000	0.50	Billable
4/22/2022 49816	Kim Fineman Postage Postage - Service of Notice of Subpoenas	0.78	2.000	1.56	Billable
5/18/2022 50304	Kim Fineman Postage Postage - letters to Legal Depts of PayPal and SFFCU regarding failure to comply with document subpoena.	0.58	4.000	2.32	Billable
7/14/2022 51368	Kim Fineman Postage Postage - service of Notice of Subpoenas on Chapin's counsel	8.50	1.000	8.50	Billable
7/19/2022 51425	Kim Fineman Postage Postage - Notice of document subpoena to American Express Company	0.60	1.000	0.60	Billable
7/29/2022 51767	Kim Fineman Postage Postage - service of notice of document subpoena to Ally Bank.	0.60	1.000	0.60	Billable
8/12/2022 52157	Kim Fineman Postage Postage - demand for client files from Fenwick	0.60	1.000	0.60	Billable
8/12/2022 52156	Kim Fineman Postage Postage - Demand for client files from Tyz Law Group	0.60	2.000	1.20	Billable
8/12/2022 52155	Kim Fineman Postage Postage - Priority Mail with Signature Confirmation for Client File demand to R. Mason in Missouri	12.60	1.000	12.60	Billable
Total: Postage					\$28.48
<u>Activity: Service Fee</u>					
8/23/2021 45046	Jennifer Hayes Service Fee Service Fee-JP Morgan Chase subpoena service	41.18	1.000	41.18	Billable
10/14/2021 46188	Jennifer Hayes Service Fee Service Fee- fee for records produced by Wells Fargo in response to subpoena re Chapin account	53.80	1.000	53.80	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
4/25/2022 49856	Kim Fineman Service Fee Service Fee - Documents Subpoena on PayPal, Inc.; One Legal Invoice 13677193	41.18	1.000	41.18	Billable
4/26/2022 49851	Kim Fineman Service Fee Service Fee - Documents Subpoena on Bank of America, NA; One Legal Invoice 13677197	41.18	1.000	41.18	Billable
4/26/2022 49848	Kim Fineman Service Fee Service Fee - Documents subpoena on Gusto, Inc.; One Legal Invoice 13677201	133.84	1.000	133.84	Billable
4/28/2022 49898	Kim Fineman Service Fee Service Fee - document subpoena to SF Federal Credit Union: One Legal invoice 13683723.	133.84	1.000	133.84	Billable
5/13/2022 50168	Kim Fineman Service Fee Service Fee - Invoice 740286 from Bank of America for document production on 5-13-22	51.92	1.000	51.92	Billable
7/15/2022 51362	Kim Fineman Service Fee Service Fee - Document Subpoena to Amazon Payments; One Legal Order#18556093	40.00	1.000	40.00	Billable
7/15/2022 51363	Kim Fineman Service Fee Service Fee - Document Subpoena on Shopify - One Legal Order #18556087	40.00	1.000	40.00	Billable
7/15/2022 51364	Kim Fineman Service Fee Service Fee - Document Subpoena on TD Bank - One Legal Order #18555928	40.00	1.000	40.00	Billable
7/18/2022 51414	Kim Fineman Service Fee Service Fee - Document Subpoena - BlockFi - One Legal Invoice No. 13858045	133.84	1.000	133.84	Billable
7/19/2022 51486	Kim Fineman Service Fee Service Fee - document subpoena - Stripe	41.18	1.000	41.18	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
7/19/2022 51489	Kim Fineman Service Fee Service Fee - document subpoena - Discover Bank	41.18	1.000	41.18	Billable
7/19/2022 51494	Kim Fineman Service Fee Service Fee - document subpoena - Discover Bank	41.18	1.000	41.18	Billable
7/19/2022 51495	Kim Fineman Service Fee Service Fee - document subpoena - E*trade	41.18	1.000	41.18	Billable
7/19/2022 51496	Kim Fineman Service Fee Service Fee - document subpoena - Gemini	41.18	1.000	41.18	Billable
7/19/2022 51498	Kim Fineman Service Fee Service Fee - document subpoena - Forge Global	41.18	1.000	41.18	Billable
7/19/2022 51499	Kim Fineman Service Fee Service Fee - document subpoena - Silvergate Bank	41.18	1.000	41.18	Billable
7/19/2022 51539	Kim Fineman Service Fee Service Fee - document subpoena - Synapse	133.84	1.000	133.84	Billable
7/19/2022 51497	Kim Fineman Service Fee Service Fee - document subpoena - Jomboy	175.02	1.000	175.02	Billable
7/21/2022 51523	Kim Fineman Service Fee Service Fee - document subpoena to Amex	41.18	1.000	41.18	Billable
7/26/2022 51641	Kim Fineman Service Fee Service Fee - Document Subpoena to Citibank.	133.84	1.000	133.84	Billable
7/27/2022 51721	Kim Fineman Service Fee Service Fee - document subpoena to Amex	257.38	1.000	257.38	Billable
8/2/2022 51910	Kim Fineman Service Fee Service Fee - Ally Bank document subpoena	41.18	1.000	41.18	Billable
8/16/2022 52261	Kim Fineman Service Fee Service Fee - Discover's invoice for third-party document production	22.00	1.000	22.00	Billable

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
8/17/2022 52254	Kim Fineman Service Fee Service Fee - document production by E*Trade	100.00	1.000	100.00	Billable
8/22/2022 52350	Kim Fineman Service Fee Service Fee - document subpoena to SVB; One Legal invoice no. 13940566	41.18	1.000	41.18	Billable
Total: Service Fee					\$1,984.66
<u>Activity: Transcript</u>					
3/30/2021 42226	S. Finestone Transcript Transcript Cost - Goode 2004 examination	1240.50	1.000	1,240.50	Billable
4/7/2021 42391	S. Finestone Transcript Transcript Cost for MHC examination	1240.50	1.000	1,240.50	Billable
Total: Transcript					\$2,481.00
<u>Activity: Travel</u>					
12/21/2021 47506	Jennifer Hayes Travel Travel expenses- bay bridge toll	6.00	1.000	6.00	Billable
12/21/2021 47489	Jennifer Hayes Travel Travel expenses-parking	35.00	1.000	35.00	Billable
Total: Travel					\$41.00
TOTAL Billable Costs					\$7,563.87
				Amount	Total
Total of Fees (Time Charges)					\$479,937.50
Total of Costs (Expense Charges)					\$7,563.87
Total new charges					\$487,501.37
Total New Balance					\$487,501.37



Everett.Benja:Kyle Everett (continued)

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Timekeeper Summary					
Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
ALR	450.00	4.20	\$1,890.00	\$1,890.00	0.00
ALR	425.00	5.90	\$2,507.50	\$2,507.50	0.00
ARL	300.00	64.60	\$19,380.00	\$19,380.00	0.00
JCH	560.00	98.30	\$55,048.00	\$55,048.00	0.00
JCH	525.00	120.70	\$63,367.50	\$63,367.50	0.00
JCL	385.00	140.60	\$54,131.00	\$54,131.00	0.00
JCL	0.00	1.70	\$0.00	\$0.00	0.00
KSF	450.00	99.70	\$44,865.00	\$44,865.00	0.00
KSF	425.00	70.60	\$30,005.00	\$30,005.00	0.00
RAW	385.00	129.40	\$49,819.00	\$49,819.00	0.00
RAW	350.00	10.60	\$3,710.00	\$3,710.00	0.00
SDF	560.00	152.20	\$85,232.00	\$85,232.00	0.00
SDF	525.00	133.30	\$69,982.50	\$69,982.50	0.00

# Exhibit B

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Nickname Everett.Benja | Eve001  
Full Name Kyle Everett  
Address 150 Post Street  
Suite 400  
San Francisco, CA 94108

Phone 1  
Phone 3  
In Ref To In re Benja Incorporated  
Case No. 20-30819

Phone 2  
Phone 4

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
Activity: Admin					
8/30/2022 52515	Jennifer Hayes Admin Emails from and to J. Zagajeski re case administration issues (.1)	560.00	0.10	56.00	Billable
8/31/2022 52569	Jennifer Hayes Admin Communications with S. Finestone regarding status of employment application in the Chapter 7 case (.1)	560.00	0.10	56.00	Billable
9/1/2022 52641	S. Finestone Admin Conf call with Kyle Everett, Joe Zagajeski and J. Hayes to update litigation targets, status of subpoenas and next steps.	560.00	1.40	784.00	Billable
9/12/2022 52838	Jennifer Hayes Admin Email to R. Witthans regarding effect of conversion on payment of administrative claims in the chapter 11 (.1)	560.00	0.10	56.00	Billable
9/19/2022 52968	S. Finestone Admin Conf call with client and J. Hayes re status of various matters.	560.00	0.50	280.00	Billable
9/22/2022 53334	Ryan Witthans Admin Review notices of change of address (0.1).	385.00	0.10	38.50	Billable
9/26/2022 53182	Jennifer Hayes Admin Email to K. Everett and J. Zagajeski re 9/30 hearing (.1); email on Omni re service of fee notice (.1)	560.00	0.20	112.00	Billable
9/28/2022 53241	Jennifer Hayes Admin Review docket order approving interim fee applications and emails to and from K. Everett, J. Zagajeski, and S. Finestone re same (.1); draft order approving Trustee's interim fee application (.2); draft order approving FH Law interim fee application (.2); emails to and from K. Everett re same and re next steps (.1)	560.00	0.60	336.00	Billable
9/30/2022 53267	Jennifer Hayes Admin Review orders approving interim fee applications and email to K. Everett	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	and J. Zagajeski re same (.1); review order approving Foppe tolling agreement (.1); emails to K. Everett, J. Zagajeski and N. Foppe re same (.1)				
10/3/2022 53477	Jennifer Hayes Admin Emails from and to K. Everett re erroneous docket entry re fee order (.1); emails from and to K. Everett regarding call to discuss various litigation matters (.1); emails from and to J. Zagajeski re additional asset search to run (.1)	560.00	0.30	168.00	Billable
2/1/2023 56025	Ryan Witthans Admin Draft short form fee application and notice of hearing for M. Coffino (0.3). Draft notice of hearing (0.1). Emails with trustee and M. Coffino re same (0.2).	385.00	0.60	231.00	Billable
2/2/2023 56020	Ryan Witthans Admin Follow-up emails with trustee re short form fee app for M. Coffino; arrange for service of notice re same (0.3).	385.00	0.30	115.50	Billable
2/2/2023 55897	S. Finestone Admin Emails with Chapin counsel.	560.00	0.10	56.00	Billable
2/3/2023 56035	Ryan Witthans Admin Review and verify service of notice of private investigator fee application; emails with J. Hayes re same (0.1).	385.00	0.10	38.50	Billable
2/7/2023 55973	Jennifer Hayes Admin Review email from United Lex re invoicing and emails to and from R. Witthans re same (.1)	560.00	0.10	56.00	Billable
2/23/2023 56381	Ryan Witthans Admin Draft proposed order approving fees of Coffino Investigations; emails with J. Hayes and M. Coffino re same (0.4).	385.00	0.40	154.00	Billable
2/27/2023 56354	Ryan Witthans Admin Emails with trustee and M. Coffino re order approving private investigator fees (0.1).	385.00	0.10	38.50	Billable
3/1/2023 56837	Ryan Witthans Admin Follow-up emails with M. Coffino and trustee re payment to Coffino Investigations (0.1).	385.00	0.10	38.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/9/2023 56463	Jennifer Hayes Admin Review email from T. Peters re settlement payment and email to K. Everett and J. Zagajeski re same (.1)	560.00	0.10	56.00	Billable
3/13/2023 56570	Jennifer Hayes Admin Emails from and to T. Peters re settlement payment and email to K. Everett re same (.1)	560.00	0.10	56.00	Billable
3/15/2023 56584	Jennifer Hayes Admin Emails from and to S. Finestone re Peters first settlement payment and review wire confirmation re same (.1)	560.00	0.10	56.00	Billable
4/11/2023 56985	Jennifer Hayes Admin Review email from United Lex re invoice and emails to and from R. Witthans re same (.1)	560.00	0.10	56.00	Billable
4/24/2023 57139	S. Finestone Admin Discuss upcoming status conference with J. Hayes and review of status conf statement.	560.00	0.20	112.00	Billable
5/1/2023 57370	Jennifer Hayes Admin Emails from and to M. Knutsen re Relativity e-discovery question (.1)	560.00	0.10	56.00	Billable
5/8/2023 57454	Jennifer Hayes Admin Review email from UnitedLex and emails to and from R. Witthans re same (.1)	560.00	0.10	56.00	Billable
6/5/2023 58008	Ryan Witthans Admin Legal research and drafting re criminal referral of D. Weiner; phone call to UST San Francisco office re same (1.0).	385.00	1.00	385.00	Billable
6/6/2023 57983	Ryan Witthans Admin Phone call with assistant UST re criminal referral procedures; continue drafting criminal referral letter re D. Weiner (0.3).	385.00	0.30	115.50	Billable
6/9/2023 58021	Ryan Witthans Admin Review UnitedLex invoice; emails with J. Hayes and trustee re same (0.2). Legal research and drafting re Cloobek motion for approval of UnitedLex expenses; emails and phone call with J. Hayes re same (1.8). Draft proposed order (0.3). Draft notice and opportunity for hearing (0.2).	385.00	2.50	962.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/9/2023 57915	Jennifer Hayes Admin Telephone call with R. Witthans re Cloobek motion (.1); emails to and from R. Witthans re same (.1)	560.00	0.20	112.00	Billable
6/13/2023 57997	Ryan Witthans Admin Emails with trustee re motion to pay ongoing UnitedLex administrative expenses; review and revise motion and related papers re same (0.2).	385.00	0.20	77.00	Billable
6/14/2023 58000	Ryan Witthans Admin Continue drafting criminal referral letter re D. Weiner to UST (1.1).	385.00	1.10	423.50	Billable
6/23/2023 58103	Ryan Witthans Admin Revise motion to pay UnitedLex in the ordinary course; voicemail and phone call with trustee re same (0.1). Continue drafting criminal referral letter re D. Weiner (1.4).	385.00	1.50	577.50	Billable
6/24/2023 58135	Ryan Witthans Admin Continue drafting criminal referral letter re D. Weiner; research referral information for interested government agencies; email to trustee re same (1.3).	385.00	1.30	500.50	Billable
6/26/2023 58162	Jennifer Hayes Admin Review and respond to email from T. Peters regarding settlement payment due (.1); email to K. Everett re same (.1)	560.00	0.20	112.00	Billable
6/27/2023 58243	Ryan Witthans Admin Follow-up emails re motion to approve payment of UnitedLex expenses and criminal referral of D. Weiner (0.1).	385.00	0.10	38.50	Billable
6/28/2023 58233	Ryan Witthans Admin Follow-up emails with trustee and J. Zagajeski re estate payments to UnitedLex (0.2).	385.00	0.20	77.00	Billable
6/29/2023 58252	Ryan Witthans Admin Revise motion and proposed order to pay UnitedLex; emails with J. Hayes re same (0.8). Further revisions to motion and proposed order (0.5). Draft supporting declaration and notice of opportunity for hearing (0.2).	385.00	1.50	577.50	Billable
6/29/2023 58227	Jennifer Hayes Admin Review and revise Cloobek motion (.1); emails from and to R. Witthans re same (.1)	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/30/2023 58255	Ryan Witthans Admin Continue drafting supporting declaration and notice of opportunity of hearing re motion to pay UnitedLex; emails with trustee re same (0.6).	385.00	0.60	231.00	Billable
7/5/2023 58617	Ryan Witthans Admin Review status of motion to pay UnitedLex administrative expenses; follow-up emails with trustee re same; finalize motion to pay UnitedLex administrative expenses and supporting papers; draft notice of opportunity for hearing; review service rules and recipient list; arrange service via service provider; draft certificates of service (0.9). Review status of criminal referral of D. Weiner; follow-up email to trustee re same (0.1). Pre-draft proposed order, request for entry of default order, and supporting declaration (0.4).	385.00	1.40	539.00	Billable
7/10/2023 58392	Jennifer Hayes Admin Emails from and to United Lex and R. Witthans re monthly hosting services invoice (.1)	560.00	0.10	56.00	Billable
7/13/2023 58562	Ryan Witthans Admin Review and revise letter criminally referring D. Weiner; follow-up emails with trustee re same (0.4).	385.00	0.40	154.00	Billable
7/14/2023 58567	Ryan Witthans Admin Review prior communications with D. Weiner; emails with trustee re contemplated edits to letter criminally referring D. Weiner (0.4).	385.00	0.40	154.00	Billable
7/18/2023 58528	Jennifer Hayes Admin Review email from United Lex and emails from and to R. Witthans re response to same (.1)	560.00	0.10	56.00	Billable
7/24/2023 58674	Jennifer Hayes Admin Emails from and to T. Peters and K. Everett re settlement payment (.1)	560.00	0.10	56.00	Billable
7/25/2023 58746	Jennifer Hayes Admin Review email from T. Peters re settlement payment	560.00	0.10	56.00	Billable
7/27/2023 58776	Ryan Witthans Admin Complete drafting of request for entry of default order, supporting declaration, and proposed order (0.4).	385.00	0.40	154.00	Billable
7/28/2023 58781	Ryan Witthans Admin Review order lifting BLR 2016-1(a) cap and authorizing payments to	385.00	0.20	77.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	UnitedLex; email to trustee re same; review emails with UnitedLex A/R department re expected follow-up re payment timeline (0.2).				
8/4/2023 58914	Jennifer Hayes Admin Telephone call with S. Finestone re SEC claim and MHC 9019 motion (.1)	560.00	0.10	56.00	Billable
8/31/2023 59459	Jennifer Hayes Admin Review multiple emails re UnitedLex invoices for litigation-related data hosting	560.00	0.10	56.00	Billable
Total: Admin			20.50		\$8,890.00
Activity: Adv Proceeding					
9/1/2022 52827	Ryan Witthans Adv Proceeding Prepare for and participate in conference call with team re litigation targets and status of adversary proceedings and discovery (1.2).	385.00	1.20	462.00	Billable
9/20/2022 53328	Ryan Witthans Adv Proceeding Emails with J. Hayes re tolling agreements with litigation targets; drafting re same (1.2).	385.00	1.20	462.00	Billable
9/21/2022 53329	Ryan Witthans Adv Proceeding Legal research and drafting re tolling agreements with litigation targets; phone call and emails with J. Hayes re same (2.5). Revisions and follow-up emails to J. Hayes re same (0.9).	385.00	3.40	1,309.00	Billable
9/22/2022 53333	Ryan Witthans Adv Proceeding Emails with J. Hayes re tolling agreements; proofread, revise, and circulate to trustee for review (0.4). Follow-up emails with team re same (0.1). Research litigation target contact information; emails with team re same; draft individualized tolling agreements; draft tolling agreement tracker (2.6).	385.00	3.10	1,193.50	Billable
9/27/2022 53347	Ryan Witthans Adv Proceeding Update tolling agreement and FRBP 2004 examination trackers (0.2).	385.00	0.20	77.00	Billable
9/28/2022 53420	Ryan Witthans Adv Proceeding Emails with J. Hayes and K. Fineman re tolling agreements; legal research and drafting/revisions re same (0.9).	385.00	0.90	346.50	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/29/2022 53220	Jennifer Hayes Adv Proceeding Emails from and to K. Everett and S. Finestone re settlement of Peters AP (.1)	560.00	0.10	56.00	Billable
9/29/2022 53355	Ryan Witthans Adv Proceeding Emails and phone call with J. Hayes re tolling agreements and related communications/negotiations with litigation targets (0.3).	385.00	0.30	115.50	Billable
9/30/2022 53359	Ryan Witthans Adv Proceeding Revise and update tolling agreement tracker (0.2). Emails with J. Hayes and team re reactivation of Relativity account (0.2).	385.00	0.40	154.00	Billable
10/6/2022 53552	Ryan Witthans Adv Proceeding Phone call with J. Hayes re anticipated complaints against litigation targets; update tolling agreement tracker re same (0.2).	385.00	0.20	77.00	Billable
10/12/2022 53771	Ryan Witthans Adv Proceeding Phone call with J. Hayes re anticipated avoidance and recovery actions (0.1). Monitor emails re tolling agreement and protective order; update case task list re same (0.2).	385.00	0.30	115.50	Billable
10/14/2022 53755	Ryan Witthans Adv Proceeding Review and analyze tolling agreements; update tolling agreement tracker re same (0.1). Review Weiner complaint; draft and update AP tracker (0.4).	385.00	0.50	192.50	Billable
10/31/2022 54044	Ryan Witthans Adv Proceeding Exchange voicemails with Daniel Weiner's counsel re trustee's adversary complaint; emails with J. Hayes re same (0.2).	385.00	0.20	77.00	Billable
11/1/2022 54666	Ryan Witthans Adv Proceeding Emails with J. Hayes re status of Weiner communications (0.1).	385.00	0.10	38.50	Billable
11/3/2022 54551	Ryan Witthans Adv Proceeding Review status of tolling agreements and 2004 exam targets (0.1). Revise tolling agreement tracker; follow-up emails with J. Hayes re same (0.2).	385.00	0.30	115.50	Billable
11/4/2022 54554	Ryan Witthans Adv Proceeding Phone call with D. Weiner's counsel; follow-up emails with J. Hayes re same (0.5).	385.00	0.50	192.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/8/2022 54189	Jennifer Hayes Adv Proceeding Review emails from and to S. Finestone and K. Everett re Peters settlement and SEC research (.1)	560.00	0.10	56.00	Billable
11/15/2022 54318	Jennifer Hayes Adv Proceeding Emails from and to S. Finestone re revisions to Peters settlement agreement (.1)	560.00	0.10	56.00	Billable
11/16/2022 54588	Ryan Witthans Adv Proceeding Emails with D. Weiner's counsel, trustee, and J. Hayes re request for extension of time to answer complaint (1.0). Follow-up emails with D. Weiner's counsel re same (0.1).	385.00	1.10	423.50	Billable
11/16/2022 54359	Jennifer Hayes Adv Proceeding Review and respond to email from R. Witthans regarding proposal from D. Weiner for extension to provide documents and respond to complaint (.1); analysis re same (.2); emails to R. Witthans re same (.1); review emails from and to R. Witthans and K. Everett re same (.1)	560.00	0.50	280.00	Billable
11/23/2022 54599	Ryan Witthans Adv Proceeding Emails with J. Hayes and D. Weiner's counsel re anticipated document production (0.2).	385.00	0.20	77.00	Billable
11/29/2022 54650	Ryan Witthans Adv Proceeding Emails with D. Weiner counsel re anticipated document production; review responsive letter and initial documents re same (0.2).	385.00	0.20	77.00	Billable
11/30/2022 54658	Ryan Witthans Adv Proceeding Emails with D. Weiner counsel re remaining document production; monitor production of same (0.1).	385.00	0.10	38.50	Billable
12/1/2022 54819	Ryan Witthans Adv Proceeding Follow-up emails with D. Weiner's counsel re status of records production (0.1).	385.00	0.10	38.50	Billable
12/2/2022 55230	Johnson Lee Adv Proceeding Call with R.Witthans re facts of case against D.Weiner (0.4).	385.00	0.40	154.00	Billable
12/2/2022 54824	Ryan Witthans Adv Proceeding Emails with M. Reeber/D. Weiner; review and analyze document production; draft detailed email to trustee re same; begin drafting letter responding to deficiencies in document production (2.2). Phone call with J.	385.00	3.20	1,232.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Lee re same (0.4). Phone call with J. Hayes re same (0.3). Phone call with trustee re same; update letter draft re counteroffer (0.3).				
12/2/2022 54743	Jennifer Hayes Adv Proceeding Email to R. Witthans re status of response to complaint filed in Weiner adversary proceeding (.1); review and respond to email from R. Witthans re same (.1); analysis re next steps and telephone call with R. Witthans re same (.2)	560.00	0.40	224.00	Billable
12/3/2022 54849	Ryan Witthans Adv Proceeding Revise responsive letter to D. Weiner (0.1).	385.00	0.10	38.50	Billable
12/5/2022 54906	Ryan Witthans Adv Proceeding Phone call with J. Hayes re letter responding to D. Weiner's document production (0.1).	385.00	0.10	38.50	Billable
12/5/2022 54846	Jennifer Hayes Adv Proceeding Analysis re strategy in Weiner adversary proceeding (.3); telephone call with R. Witthans re same (.2)	560.00	0.50	280.00	Billable
12/7/2022 54944	Ryan Witthans Adv Proceeding Revise letter draft re response to D. Weiner (0.5).	385.00	0.50	192.50	Billable
12/8/2022 54952	Ryan Witthans Adv Proceeding Further revisions to letter responding to D. Weiner; emails with J. Hayes re same (1.5).	385.00	1.50	577.50	Billable
12/8/2022 54921	Jennifer Hayes Adv Proceeding Review and analysis of meet and confer letter to D. Weiner (.2); emails from and to R. Witthans re same (.1)	560.00	0.30	168.00	Billable
12/9/2022 54962	Ryan Witthans Adv Proceeding Phone call with trustee re letter responding to D. Weiner; revisions to letter and legal research re additional liability; send letter to D. Weiner's counsel (0.8). Legal research re recovery of fraudulent transfers in Ponzi scheme (1.0). Follow-up emails with D. Weiner's counsel and phone call with J. Hayes re timing of answer (0.2).	385.00	2.00	770.00	Billable
12/9/2022 54979	Jennifer Hayes Adv Proceeding Emails from and to R. Witthans re Weiner's request for further extension of time to respond to complaint (.1); analysis re same and telephone call with R. Witthans re same (.2)	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
12/13/2022	Ryan Witthans 55059 Adv Proceeding Emails with trustee re D. Weiner AP answer and additional document production (0.1).	385.00	0.10	38.50	Billable
12/15/2022	Ryan Witthans 55054 Adv Proceeding Emails and phone call with M. Reeber re D. Weiner's renewed interest in settlement and anticipated answer to complaint (0.3).	385.00	0.30	115.50	Billable
12/20/2022	Jennifer Hayes 55127 Adv Proceeding Review emails from J. Zagajeski and K. Everett regarding Weiner adversary proceeding (.1); email to R. Witthans re status of initial disclosures and Rule 26 conference (.1)	560.00	0.20	112.00	Billable
1/3/2023	Ryan Witthans 55475 Adv Proceeding Review Weiner AP answer and complaint (0.5). Draft request for notice (0.1). Emails with M. Reeber/D. Weiner re discovery conference (0.2).	385.00	0.80	308.00	Billable
1/6/2023	Jennifer Hayes 55303 Adv Proceeding Email to R. Witthans re discovery conference in Everett v Weiner (.1)	560.00	0.10	56.00	Billable
1/9/2023	Ryan Witthans 55768 Adv Proceeding Emails with M. Reeber re discovery conference and additional document production expected from D. Weiner; review and update tracker with case deadlines re same (0.2).	385.00	0.20	77.00	Billable
1/18/2023	Jennifer Hayes 55538 Adv Proceeding Review and analysis of email from M. St. James re inability to make first payment in Peters settlement (.3); telephone call with S. Finestone re same (.1)	560.00	0.40	224.00	Billable
1/19/2023	Ryan Witthans 55809 Adv Proceeding Review D. Weiner's request to continue scheduling conference; emails with court staff and trustee re same (0.2).	385.00	0.20	77.00	Billable
1/19/2023	Jennifer Hayes 55577 Adv Proceeding Review D. Weiner request for continuance and email from Chambers re same (.1); multiple emails from and to R. Witthans re same (.1)	560.00	0.20	112.00	Billable
1/20/2023	Ryan Witthans 55844 Adv Proceeding Draft initial disclosures for Weiner AP (1.1). Draft initial disclosures; emails with trustee re same (0.7). Review and analyze additional document production from D. Weiner; email trustee re same (0.4).	385.00	2.20	847.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
1/23/2023 55652	Jennifer Hayes Adv Proceeding Review emails from R. Witthans, K. Everett, and J. Zagajeski re additional documents produced by D. Weiner (duplicates and incomplete) (.1); email from and to K. Everett re Weiner adversary proceeding (.1)	560.00	0.20	112.00	Billable
1/27/2023 55714	Jennifer Hayes Adv Proceeding communications with S. Finestone re next step in Peters litigation (.1); analysis re same (.2); review multiple emails from K. Everett and S. Finestone re same (.1)	560.00	0.40	224.00	Billable
2/9/2023 56245	Ryan Witthans Adv Proceeding Phone call from D. Weiner re settlement and upcoming scheduling conference (0.7). Draft joint discovery plan (0.6).	385.00	1.30	500.50	Billable
2/10/2023 56228	Ryan Witthans Adv Proceeding Follow-up call with D. Weiner re documents (0.3). Email to trustee re status of AP, expected documents, and anticipated settlement offer (0.7). Follow-up emails with trustee, J. Hayes, and D. Weiner re same (0.2).	385.00	1.20	462.00	Billable
2/13/2023 56213	Ryan Witthans Adv Proceeding Review billing records related to Weiner AP and D. Weiner's recent document production; emails and phone call with J. Hayes re same; email to trustee with analysis of documents and proposal for settlement counteroffer (1.8).	385.00	1.80	693.00	Billable
2/15/2023 56219	Ryan Witthans Adv Proceeding Phone call with D. Weiner re scheduling conference and settlement negotiations (0.3).	385.00	0.30	115.50	Billable
2/22/2023 56344	Ryan Witthans Adv Proceeding Follow-up emails with D. Weiner and trustee re possible settlement, mediation, and/or trial (0.1).	385.00	0.10	38.50	Billable
2/23/2023 56382	Ryan Witthans Adv Proceeding Review order continuing scheduling conference; email to D. Weiner re same and negotiation status (0.2).	385.00	0.20	77.00	Billable
2/24/2023 56305	Jennifer Hayes Adv Proceeding Emails from and to L. Parada and B. Reed re continuance of status conference (.1); draft stipulation re same (.1); emails to and from B. Reed re same (.1)	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/8/2023 56768	Ryan Witthans Adv Proceeding Emails with client re response to D. Weiner's settlement offer (0.1).	385.00	0.10	38.50	Billable
3/16/2023 56761	Ryan Witthans Adv Proceeding Email to trustee re Weiner AP; phone calls with J. Hayes and trustee re same; draft email to D. Weiner re counteroffer (0.7).	385.00	0.70	269.50	Billable
3/16/2023 59394	Ryan Witthans Adv Proceeding Email to trustee re Weiner AP; phone calls with J. Hayes and trustee re same; draft email to D. Weiner re counteroffer (0.7).	385.00	0.70	269.50	Billable
3/17/2023 56766	Ryan Witthans Adv Proceeding Send trustee's counteroffer to D. Weiner (0.2).	385.00	0.20	77.00	Billable
3/21/2023 56781	Ryan Witthans Adv Proceeding Voicemail to trustee and emails with trustee and D. Weiner re settlement negotiations (0.2).	385.00	0.20	77.00	Billable
3/22/2023 56784	Ryan Witthans Adv Proceeding Emails with trustee and J. Hayes re settlement negotiations and criminal referral; research re same (0.3).	385.00	0.30	115.50	Billable
3/22/2023 56668	Jennifer Hayes Adv Proceeding Review and analysis of D. Weiner response to settlement offer (.1); emails to and from K. Everett re same (.2); preliminary analysis re possible criminal referral (.2)	560.00	0.50	280.00	Billable
3/30/2023 56801	Ryan Witthans Adv Proceeding Review email from D. Weiner re settlement negotiations; emails with J. Hayes, J. Zagajeski, and D. Weiner re same (0.5).	385.00	0.50	192.50	Billable
4/3/2023 57282	Johnson Lee Adv Proceeding Communication with R.Witthans re D.Weiner's alleged defenses and review of evidence re his coordination with A.Chapin (0.2). Drafted email with evidence (0.1). Call with R.Witthans explaining evidence contradicting D.Weiner's allegations (0.3).	385.00	0.60	231.00	Billable
4/3/2023 57181	Ryan Witthans Adv Proceeding Review evidence re fraud perpetrated by D. Weiner; phone call with J. Lee re same; emails with J. Hayes and trustee re response to D. Weiner (1.8).	385.00	1.80	693.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/4/2023 57222	Ryan Witthans Adv Proceeding Emails with J. Zagajeski re investments from creditors for inclusion in email to D. Weiner; update email draft to D. Weiner (0.3).	385.00	0.30	115.50	Billable
4/5/2023 57183	Ryan Witthans Adv Proceeding Emails to and from D. Weiner re settlement negotiations; emails with J. Hayes and trustee re same (1.8).	385.00	1.80	693.00	Billable
4/7/2023 57186	Ryan Witthans Adv Proceeding Phone call with trustee re settlement negotiations with D. Weiner; follow-up phone call with J. Hayes re same (0.4).	385.00	0.40	154.00	Billable
4/11/2023 57190	Ryan Witthans Adv Proceeding Draft settlement agreement with D. Weiner (0.3).	385.00	0.30	115.50	Billable
4/12/2023 57207	Ryan Witthans Adv Proceeding Draft D. Weiner settlement agreement and consent judgment (3.1).	385.00	3.10	1,193.50	Billable
4/13/2023 57247	Ryan Witthans Adv Proceeding Revise settlement agreement and consent judgment; draft email to D. Weiner; emails with trustee re same (1.4). Follow-up email to trustee re same (0.1).	385.00	1.50	577.50	Billable
4/14/2023 57234	Ryan Witthans Adv Proceeding Emails with trustee and D. Weiner re settlement counteroffer (0.4).	385.00	0.40	154.00	Billable
4/17/2023 57235	Ryan Witthans Adv Proceeding Emails with D. Weiner and trustee re settlement negotiations (0.3).	385.00	0.30	115.50	Billable
4/27/2023 57325	Ryan Witthans Adv Proceeding Prepare for tomorrow's status conference (0.2). Draft status conference statement (0.5). Revise settlement agreement to reflect new proposed terms; phone calls with trustee and J. Hayes re same (0.8).	385.00	1.50	577.50	Billable
4/28/2023 57319	Ryan Witthans Adv Proceeding Further revisions to proposed settlement agreement; emails with trustee re same; emails and phone call with D. Weiner re same; prepare for status conference (2.3). Appear at status conference (0.2). Follow-up emails with D. Weiner and trustee to coordinate full execution of settlement documents (0.2).	385.00	2.70	1,039.50	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
5/16/2023 57636	Jennifer Hayes Adv Proceeding Review and respond to email from S. Finestone regarding email from Chambers inquiring as to status of dismissal (.1); review and analysis of settlement agreement (.1); email to S. Finestone re same (.1)	560.00	0.30	168.00	Billable
7/14/2023 58568	Ryan Witthans Adv Proceeding Review MHC status conference statements; emails and phone call with J. Hayes re upcoming status conference (0.4).	385.00	0.40	154.00	Billable
Total: Adv Proceeding			53.70		\$21,532.00
Activity: AP - MHC					
9/28/2022 53232	Jennifer Hayes AP - MHC Draft status conference statement (.2); email to B. Reed re same (.1)	560.00	0.30	168.00	Billable
9/29/2022 53219	Jennifer Hayes AP - MHC Review and finalize status conference statement (.1); emails from and to B. Reed re same (.1); email to L. Parada re same (.1); email to K. Everett re MHC mediation and scheduling of same (.1); multiple further emails re rescheduling of status conference (.1)	560.00	0.50	280.00	Billable
11/15/2022 54316	Jennifer Hayes AP - MHC Prepare for status conference (.1); emails to and from B. Reed re same (.1); emails to and from G. Kalikman regarding mediation agreement and return of signatures for same (.1); email to Chambers requesting continuance of 11/18 status conference (.1)	560.00	0.40	224.00	Billable
11/16/2022 54396	Jennifer Hayes AP - MHC Review and respond to email from L. Parada re MHC status conference and continuance of same (.1)	545.00	0.10	54.50	Billable
11/18/2022 54391	Jennifer Hayes AP - MHC Begin drafting mediation brief for MHC mediation (1.9)	560.00	1.90	1,064.00	Billable
11/22/2022 54442	Jennifer Hayes AP - MHC Continued analysis re MHC's defenses to remaining claim	560.00	0.30	168.00	Billable
11/28/2022 54523	Jennifer Hayes AP - MHC Listen to detailed voicemail from G. Gerstner re mediation rescheduling and mediation issues (.1); voicemails to G. Gerstner and B. Reed re same (.1); review emails from B. Reed re same (.1); draft email to opposing counsel re same (.2); telephone call with G. Gerstner re same and re	560.00	1.00	560.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	mediation substantive issues (.4); emails to and from K. Everett re mediation rescheduling (.1)				
12/2/2022 54760	Jennifer Hayes AP - MHC Follow up email to MHC's counsel re dates for rescheduling of mediation (.1)	560.00	0.10	56.00	Billable
12/3/2022 54756	Jennifer Hayes AP - MHC Emails from and to G. Gerstner and G. Kalikman re mediation scheduling (.1); emails to and from K. Everett re same (.1); further emails to G. Gerstner and G. Kalikman re same (.1); review email from G. Gerstner re same and email to K. Everett re same (.1)	560.00	0.40	224.00	Billable
5/26/2023 57743	Jennifer Hayes AP - MHC Review and respond to email from B. Reed re today's status conference (.1); draft status conference statement (.2); emails to and from B. Reed and Chambers re same (.1); emails to and from K. Everett re status conference continuance (.1); telephone call with K. Everett re counteroffer (.1)	560.00	0.60	336.00	Billable
Total: AP - MHC			5.60		\$3,134.50
<u>Activity: Assets</u>					
9/29/2022 53209	S. Finestone Assets Emails regarding director claims and related matters.	560.00	0.30	168.00	Billable
9/30/2022 53224	Jennifer Hayes Assets Review and respond to email from K. Everett re possible claims against Sklar (.1); emails from and to M. Meyers re scheduling a call to discuss same (.1); telephone call with K. Everett regarding potential Sklar claims (.4); listen to voicemail from M. Myers and email to M. Meyers re timing for call (.1); telephone call with M. Meyers regarding proposed tolling agreement (.1); email to K. Everett re same and re next steps (.2); review and respond to email from K. Everett re same (.1); further email to M. Meyers re proposed revisions to tolling agreement (.1)	560.00	1.20	672.00	Billable
10/11/2022 53511	S. Finestone Assets Discussions and emails with J. Hayes re potential claims.	560.00	0.50	280.00	Billable
6/27/2023 58190	Jennifer Hayes Assets Emails from and to K. Fineman re Jomboy claims and next steps (.1)	560.00	0.10	56.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
Total: Assets			2.10		\$1,176.00
<u>Activity: Claims</u>					
9/15/2022 53030	Jennifer Hayes Claims Review multiple emails from K. Fineman, J. Zagajeski and K. Everett re subpoena results and next steps (.1); email to K. Fineman re same (.1)	560.00	0.20	112.00	Billable
9/27/2022 53186	Jennifer Hayes Claims Review and respond to email from S. Finestone re possible defenses to remaining claims (.1)	560.00	0.10	56.00	Billable
9/27/2022 53184	Jennifer Hayes Claims Continued analysis re claims and defenses re remaining litigation targets and legal research re same (2.7); telephone call with S. Finestone re same (.2)	560.00	2.90	1,624.00	Billable
9/30/2022 53254	Jennifer Hayes Claims Analysis re claims against Sklar (.4); email to K. Everett and J. Zagajeski re same (.1); further analysis re Sklar claims and further emails from and to K. Everett re same (.2); telephone call with M. Coffino re asset searches on Chapin, Foppe, and Sklar (.3); review proposed revised terms of Sklar tolling agreement (.1); email to K. Everett re same and review and respond to email from M. Meyers re same (.1); review and respond to email from M. Coffino re asset report and email to K. Everett and J. Zagajeski re same (.1)	560.00	1.30	728.00	Billable
10/4/2022 53450	Jennifer Hayes Claims Review and analysis of M. Meyers re proposed revised terms of tolling agreement (.3); email to K. Everett and J. Zagajeski re same (.1); further emails from and to K. Everett re same (.2); email proposal to M. Meyers (.2); email to K. Everett re same (.1); review and respond to email from M. Meyers re same (.1); review and analysis of proposed revisions to Jomboy tolling stipulation and order (.1); email to K. Everett re same (.1); email to Jomboy's counsel re proposed revisions to tolling stipulation and order and next steps (.1)	560.00	1.30	728.00	Billable
11/7/2022 54606	Johnson Lee Claims Call with S.Finestone re SEC's claim on behalf of defrauded investors, objections by creditors and treatment of SAFE-based claims (0.1)  Reviewed correspondence from creditors' counsel R.Hauptman re SAFE claims, SEC's Claim No. 28, and SAFE agreements (0.3).	385.00	0.40	154.00	Billable

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Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/7/2022 54131	S. Finestone Claims Discussion and emails with J. Lee re SEC issues.	560.00	0.50	280.00	Billable
11/8/2022 54608	Johnson Lee Claims Preliminary research re treatment of SEC claims on behalf of defrauded investors in bankruptcy (2.0).	385.00	2.00	770.00	Billable
11/9/2022 54694	Johnson Lee Claims Further legal research re subordination of investor claims under section 510, and additional context of SEC enforcement actions (2.8).	385.00	2.80	1,078.00	Billable
11/9/2022 54208	Jennifer Hayes Claims Emails from and to United Lex re invoice and emails to and from R. Withans re same (.1)	560.00	0.10	56.00	Billable
11/16/2022 54614	Johnson Lee Claims Call with S.Finestone re equitable arguments for allowance of defrauded investor claims (0.1).	385.00	0.10	38.50	Billable
12/12/2022 55232	Johnson Lee Claims Additional legal research re SEC's disgorgement claim as it relates to creditor claims (1.5). Reviewed docket of SEC case against A.Chapin and Benja (0.2).	385.00	1.70	654.50	Billable
12/13/2022 55220	Johnson Lee Claims Began draft re case law concerning treatment of SEC disgorgement claims (0.9).	385.00	0.90	346.50	Billable
1/17/2023 55502	S. Finestone Claims Emails and discussions with J. Hayes re SEC claims and potential subordination of investor claims.	560.00	0.60	336.00	Billable
7/27/2023 58735	Jennifer Hayes Claims Telephone call with S. Finesetone re SEC claim/investor claims and timing of settlement motion re same (.1)	560.00	0.10	56.00	Billable
8/1/2023 58837	S. Finestone Claims Email to client discussing SEC issues	560.00	0.30	168.00	Billable
Total: Claims			15.30	\$7,185.50	

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
<u>Activity: Complaint</u>					
8/29/2022 52516	Jennifer Hayes Complaint Review email from K. Everett re scheduling a call to discuss possible new complaints and email to S. Finestone re same (.1); review and respond to emails from S. Finestone and K. Everett re same (.1)	560.00	0.20	112.00	Billable
10/7/2022 53980	Johnson Lee Complaint Communications with J.Hayes re claims against Benja insiders S.Sklar, T.Goode, and D.Weiner (0.1). Reviewed email from J.Hayes re basis of claims and potential causes of action against Benja insiders (0.1).  Reviewed exemplars of complaints for potential claims against Benja insiders (0.4). Reviewed research into in pari delicto defense (1.0).	385.00	1.60	616.00	Billable
10/11/2022 53528	Jennifer Hayes Complaint Emails from and to J. Lee re draft complaint against litigation targets (.1)	560.00	0.10	56.00	Billable
10/14/2022 53984	Johnson Lee Complaint Reviewed and replied to email from J.Hayes re drafting and filing of complaint against D.Weiner (0.1).  Drafted complaint against D.Weiner for avoidance and recovery of fraudulent transfers, aiding and abetting fraud, violations of Cal. Bus. & Prof. Code section 17200, accounting and turnover, disallowance of claim, and declaratory relief; including final review and edits (6.2).  Follow-up communication with J.Hayes re complaint (0.1).	385.00	6.40	2,464.00	Billable
10/15/2022 53990	Johnson Lee Complaint Received and reviewed email from J.Zagajeski and conferred with J.Hayes re factual allegation in complaint (0.1).	385.00	0.10	38.50	Billable
10/15/2022 53698	Jennifer Hayes Complaint Review and respond to email from J. Zagajeski re complaint (.1); emails from and to J. Lee re same (.1)	560.00	0.20	112.00	Billable
10/17/2022 53694	Jennifer Hayes Complaint Review and analysis of court's orders and summons (.2); analysis re service packet (.1); draft proof of service (.1); serve complaint, summons, and related documents (.2, n/c)	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
11/1/2022 54070	Jennifer Hayes Complaint Email to R. Witthans regarding call with lawyer re Weiner adversary proceeding (.1); review and respond to email from R. Witthans re same (.1)	560.00	0.20	112.00	Billable
4/5/2023 56924	Jennifer Hayes Complaint Telephone call with K. Fineman re background information for Jomboy complaint (.1)	560.00	0.10	56.00	Billable
4/7/2023 56970	Kim Fineman Complaint Review and analyze discovery productions and records in preparation for drafting adversary complaint against Jomboy.	450.00	1.80	810.00	Billable
4/7/2023 56975	Kim Fineman Complaint Begin drafting complaint against Jomboy.	450.00	2.40	1,080.00	Billable
4/7/2023 56999	Jennifer Hayes Complaint Emails from and to K. Fineman re status of Jomboy complaint (.1)	560.00	0.10	56.00	Billable
4/8/2023 56976	Kim Fineman Complaint Research history and capitalization records from Jomboy for inclusion in complaint allegations.	450.00	2.50	1,125.00	Billable
4/8/2023 56977	Kim Fineman Complaint Draft complaint against Jomboy.	450.00	4.20	1,890.00	Billable
4/9/2023 56978	Kim Fineman Complaint Draft complaint against Jomboy.	450.00	3.70	1,665.00	Billable
4/10/2023 56968	Jennifer Hayes Complaint Review and respond to email from K. Fineman re draft Jomboy complaint (.1)	560.00	0.10	56.00	Billable
4/10/2023 56979	Kim Fineman Complaint Review and revise Complaint against Jomboy.	450.00	2.70	1,215.00	Billable
4/11/2023 56984	Jennifer Hayes Complaint Review and revise draft complaint against Jomboy (.9); email to K. Fineman re same (.1); review and respond to email from K. Fineman re same and re strategy and damages issues (.2); further emails from and to K. Fineman, K. Everett, and J. Zagajeski re same (.2)	560.00	1.40	784.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/11/2023	Kim Fineman 57002 Complaint Correspondence with J. Hayes regarding recommended strategy as to Jomboy.	450.00	0.40	180.00	Billable
4/11/2023	Kim Fineman 56995 Complaint Correspondence with K. Everett and J. Zagajeski regarding draft Complaint against Jomboy and proposed strategy.	450.00	0.60	270.00	Billable
4/12/2023	Kim Fineman 57053 Complaint Conference call with K. Everett, J. Zagajeski and J. Hayes regarding strategy for Jomboy complaint.	450.00	0.20	90.00	Billable
4/12/2023	Kim Fineman 57031 Complaint Telephone conference with K. Banner, attorney for Jomboy, regarding draft Adversary Complaint and extension of Tolling Agreement (.2); Follow-up with K. Everett regarding same (.1)	450.00	0.30	135.00	Billable
4/12/2023	Kim Fineman 57058 Complaint Review terms of stipulated protective order in anticipation of filing complaint against Jomboy.	450.00	0.40	180.00	Billable
4/12/2023	Kim Fineman 57054 Complaint Draft and finalize letter to P. Banner and S. Stein for transmittal of draft Jomboy complaint.	450.00	0.70	315.00	Billable
4/12/2023	Jennifer Hayes 57065 Complaint Emails from and to J. Zagajeski and K. Fineman re call to discuss Jomboy complaint (.1); prepare for and participate in same (.2); review draft letter to Jomboy's counsel and emails from and to K. Fineman re same (.1); further emails from and to K. Fineman re same (.1); telephone call with K. Fineman re Jomboy's response (.1)	560.00	0.60	336.00	Billable
4/13/2023	Kim Fineman 57079 Complaint Follow-up correspondence with K. Banner, attorney for Jomboy, regarding stipulation to extend Tolling Agreement.	450.00	0.10	45.00	Billable
4/13/2023	Kim Fineman 57033 Complaint Draft proposed stipulation extending Tolling Agreement and order thereon as to Jomboy.	450.00	0.90	405.00	Billable
4/14/2023	Kim Fineman 57082 Complaint Review order entered approving stipulation to extend Tolling Agreement	450.00	0.30	135.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	(.1); Correspondence with K. Banner regarding same (.1); Correspondence with K. Everett and J. Zagazeski regarding same (. 1).				
4/14/2023 57040	Kim Fineman Complaint Finalize and file stipulation to extend tolling agreement and proposed order.	450.00	0.40	180.00	Billable
Total: Complaint			33.10		\$14,742.50
<u>Activity: Creditor Issues</u>					
9/22/2022 53000	S. Finestone Creditor Issues Emails with counsel for SEC re updates	560.00	0.10	56.00	Billable
9/23/2022 53202	Jennifer Hayes Creditor Issues Telephone call with R. Michelson re case status (.1)	560.00	0.10	56.00	Billable
9/26/2022 53134	S. Finestone Creditor Issues Conf call with counsel for Busey Bank to update status of various matters, discuss potential pursuit of Chapin and related issues.	560.00	0.50	280.00	Billable
9/27/2022 53147	S. Finestone Creditor Issues Zoom conference with counsel for SEC re case update, potential distributions and other matters.	560.00	0.50	280.00	Billable
10/4/2022 53439	S. Finestone Creditor Issues Tel call with Michael Stern at Empowerment regarding status of litigation and potential pursuit of Chapin on behalf of the estate (.3); emails and discussions with J. Hayes regarding SEC claim (.2)	560.00	0.50	280.00	Billable
10/11/2022 53507	S. Finestone Creditor Issues Zoom call with SEC re claims in case and treatment of investors (.4); discuss same with J. Hayes and email to client re same.	560.00	0.60	336.00	Billable
10/11/2022 53559	Jennifer Hayes Creditor Issues Telephone call with S. Finestone re SEC's proposal (.1)	560.00	0.10	56.00	Billable
10/13/2022 53619	S. Finestone Creditor Issues Emails with SEC re investor claims.	560.00	0.30	168.00	Billable
10/19/2022 53723	S. Finestone Creditor Issues Tel call with counsel for Empowerment re case status and other issues.	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/26/2022	Jennifer Hayes 53881 Creditor Issues Review emails from and to S. Finestone and K. Everett re SEC request re treatment of investor claims (.1)	560.00	0.10	56.00	Billable
10/26/2022	S. Finestone 53852 Creditor Issues Email to client regarding issues with regarding to SEC claim and equity vs. creditor issue and review materials from counsel for EPowerment re same.	560.00	0.60	336.00	Billable
10/27/2022	S. Finestone 53860 Creditor Issues Follow up emails with client regarding SEC/investor claim issues.	560.00	0.20	112.00	Billable
11/28/2022	S. Finestone 54499 Creditor Issues Emails to creditors to update on MHC mediation schedule.	560.00	0.10	56.00	Billable
11/29/2022	S. Finestone 54503 Creditor Issues Follow up emails with Busey Bank counsel.	560.00	0.20	112.00	Billable
12/5/2022	S. Finestone 54779 Creditor Issues Email with counsel for SEC	560.00	0.10	56.00	Billable
12/6/2022	S. Finestone 54797 Creditor Issues Tel call with counsel for SEC regarding potential subordination issues; follow up emails and review cases provided by SEC counsel re same issues.	560.00	0.90	504.00	Billable
12/8/2022	S. Finestone 54917 Creditor Issues Research on potential basis to deny employee claims due to involvement in Ponzi scheme - new decision from the 10th Circuit. Emails to R. Witthans re same.	560.00	0.60	336.00	Billable
12/8/2022	S. Finestone 54916 Creditor Issues Review cases provided by SEC on disgorgement and subordination issues.	560.00	0.80	448.00	Billable
1/11/2023	S. Finestone 55358 Creditor Issues Email with M. Stern for Epowerment with updates.	560.00	0.10	56.00	Billable
1/31/2023	Jennifer Hayes 55875 Creditor Issues Email to R. Witthans re fee application for Coffino Investigations (.1)	560.00	0.10	56.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
2/21/2023 56204	Jennifer Hayes Creditor Issues Review and analysis of emails from J. Switzer and S. Finestone re status of MHC settlement efforts (.1); email to J. Switzer re same (.1); emails to K. Everett re same (.1); review and analysis of mediation agreement confidentiality provisions (.1); further emails from and to J. Switzer re status of mediation efforts (.1)	560.00	0.50	280.00	Billable
2/21/2023 56196	S. Finestone Creditor Issues Emails with counsel for Busey Bank with updates.	560.00	0.10	56.00	Billable
4/27/2023 57285	Jennifer Hayes Creditor Issues Review and respond to email from J. Switzer re status of MHC negotiations (.2); review request fro J. Switzer for tax analysis and emails to and from K. Everett re same (.1); review and revise memo re preliminary tax analysis (.2); email to J. Switzer re same (.1)	560.00	0.60	336.00	Billable
5/31/2023 57740	Jennifer Hayes Creditor Issues Review and respond to email from J. Switzer re status of MHC settlement negotiations (.1)	560.00	0.10	56.00	Billable
7/28/2023 58715	S. Finestone Creditor Issues Emails with MS Empowerment re status of MHC litigation and other matters.	560.00	0.10	56.00	Billable
7/28/2023 58716	S. Finestone Creditor Issues Emails with counsel for SEC	560.00	0.10	56.00	Billable
8/1/2023 58849	Jennifer Hayes Creditor Issues Review and respond to email from J. Switzer re MHC settlement agreement (.1)	560.00	0.10	56.00	Billable
8/1/2023 59131	S. Finestone Creditor Issues Emails with counsel for Busey Bank re status of settlement.	560.00	0.10	56.00	Billable
8/2/2023 58864	Jennifer Hayes Creditor Issues Emails from and to S. Finestone and K. Everett re SEC and investor claims issues (.1); telephone call with K. Everett and S. Finestone re same (.1)	560.00	0.20	112.00	Billable
8/2/2023 58843	S. Finestone Creditor Issues Zoom conference with counsel for SEC (.3) and follow-up call with client and J. Hayes re estate's position on proposal to withdrawal of SEC claim	560.00	0.60	336.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	in exchange for treating investor claims as general unsecured claims (.3)				
8/10/2023 59023	Jennifer Hayes Creditor Issues Review and analysis of email from J. Switzer (.1); email to MHC's counsel re same (.1); email to K. Everett re same (.1); email to J. Switzer re Busey's request for underlying spreadsheet (.1); further emails from and to K. Everett and MHC's counsel re same (.1)	560.00	0.50	280.00	Billable
8/18/2023 59067	S. Finestone Creditor Issues Tel call and email with counsel for Busey Bank re MHC settlement and treatment of investor claims in case; emails re same.	560.00	0.50	280.00	Billable
8/22/2023 59161	S. Finestone Creditor Issues Further emails with counsel for Busey re form of order in MHC settlement.	560.00	0.10	56.00	Billable
Total: Creditor Issues			10.40		\$5,824.00
<u>Activity: Disc MHC ESI</u>					
6/9/2023 57928	Jennifer Hayes Disc MHC ESI Review email from UnitedLex re e-discovery invoice and email to R. Withthans re same and re filing motion for approval of payment (.1)	560.00	0.10	56.00	Billable
Total: Disc MHC ESI			0.10		\$56.00
<u>Activity: Discovery</u>					
8/26/2022 52439	Kim Fineman Discovery Telephone call to L. Kolker of CitiBank in follow-up to notation in production regarding deposit accounts inquiry.	450.00	0.10	45.00	Billable
8/26/2022 52424	Kim Fineman Discovery Telephone conference with J. Zagajeski regarding acknowledgement of protective order for Jomboy production.	450.00	0.10	45.00	Billable
8/26/2022 52418	Kim Fineman Discovery Follow up correspondence with D. Staab, attorney for BlockFi, regarding status of proposed stipulation for protective order.	450.00	0.20	90.00	Billable
8/26/2022 52423	Kim Fineman Discovery Correspondence with S. Stein, counsel for Jomboy, transmitting balance of document production.	450.00	0.20	90.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/26/2022 52428	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding document production from Ally Bank.	450.00	0.20	90.00	Billable
8/26/2022 52426	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding balance of document production by Jomboy.	450.00	0.30	135.00	Billable
8/26/2022 52419	Kim Fineman Discovery Review and update status tracker for document subpoenas to third parties.	450.00	0.70	315.00	Billable
8/26/2022 52427	Kim Fineman Discovery Review and analyze document production from Ally Bank.	450.00	0.70	315.00	Billable
8/26/2022 52430	Kim Fineman Discovery Review document produced by Jomboy.	450.00	0.90	405.00	Billable
8/26/2022 52432	Jennifer Hayes Discovery Review emails from K. Fineman re Ally Bank and Jomboy document productions and summaries of same (.2); review and respond to email from M. Knudsen re ESI storage options (.1)	560.00	0.30	168.00	Billable
8/29/2022 52490	Kim Fineman Discovery Review transcript of 2004 examination of T. Goode regarding additional documents and information agreed to be produced.	450.00	1.70	765.00	Billable
8/29/2022 52524	Jennifer Hayes Discovery Review and analysis of email from M. Knutsen re Relativity storage options (.1); email to K. Everett and J. Zagajeski re same and re scheduling a call to discuss litigation matters (.1)	560.00	0.20	112.00	Billable
8/30/2022 52494	Kim Fineman Discovery Telephone call to J. Merritt, attorney for T. Goode, regarding outstanding documents agreed to be produced.	450.00	0.10	45.00	Billable
8/30/2022 52493	Kim Fineman Discovery Correspondence with K. Everett and J. Zagajeski regarding outstanding information from T. Goode.	450.00	0.20	90.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/30/2022 52513	Kim Fineman Discovery Complete review of transcript of 2004 examination of T. Goode regarding follow-up items he agreed to produce to the Trustee.	450.00	1.10	495.00	Billable
8/30/2022 52518	Jennifer Hayes Discovery Follow up email to K. Everett and J. Zagajeski re Relativity versus Nearline (.1); review emails from K. Fineman, K. Everett, and J. Zagajeski re Goode documents (.1); review and respond to email from K. Everett re Relativity/Nearline and email to M. Knutsen re same (.1); further emails from and to M. Knutsen re same and email to K. Everett, and J. Zagajeski re same (.1)	560.00	0.40	224.00	Billable
8/31/2022 52500	Kim Fineman Discovery Telephone call to Amex to follow-up regarding overdue production on document subpoena.	450.00	0.20	90.00	Billable
8/31/2022 52507	Kim Fineman Discovery Telephone call to Forge regarding failure to comply with document subpoena dated July 14, 2022.	450.00	0.20	90.00	Billable
8/31/2022 52519	Kim Fineman Discovery Review and analyze production by Silvergate Bank (.5); Correspondence with K. Everett and J. Zagajeski regarding same (.1).	450.00	0.60	270.00	Billable
8/31/2022 52509	Kim Fineman Discovery Correspondence with Silvergate Bank representative regarding production.	450.00	0.80	360.00	Billable
8/31/2022 52511	Kim Fineman Discovery Review and analyze status of third-party document subpoenas.	450.00	1.20	540.00	Billable
9/1/2022 52713	Kim Fineman Discovery Telephone call with C. Park of Forge Global regarding outstanding document subpoena.	450.00	0.10	45.00	Billable
9/1/2022 52717	Kim Fineman Discovery Review voice message from American Express subpoena response unit.	450.00	0.10	45.00	Billable
9/1/2022 52704	Kim Fineman Discovery Correspondence with C. Park of Forge Global regarding outstanding document subpoena and extension for production.	450.00	0.20	90.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/1/2022 52718	Kim Fineman Discovery Correspondence with American Express' subpoena response unit regarding pending production.	450.00	0.30	135.00	Billable
9/2/2022 52705	Kim Fineman Discovery Telephone call to D. Staab, attorney for BlockFi, regarding outstanding stipulation for protective order and document production.	450.00	0.10	45.00	Billable
9/2/2022 52701	Kim Fineman Discovery Telephone conference with R. Kanowitz, attorney for BlockFi, regarding outstanding stipulation for protective order and document production.	450.00	0.20	90.00	Billable
9/2/2022 52710	Kim Fineman Discovery Confer with N.Gill, attorney for Amazon, regarding outstanding production.	450.00	0.20	90.00	Billable
9/2/2022 52709	Kim Fineman Discovery Review and analyze final supplemental production by Jomboy.	450.00	0.90	405.00	Billable
9/6/2022 52716	Kim Fineman Discovery Correspondence with Z. Fedde, attorney assisting T. Goode, regarding request for follow-up information.	450.00	0.10	45.00	Billable
9/7/2022 52753	Kim Fineman Discovery Review and analyze document production from BlockFi.	450.00	2.10	945.00	Billable
9/7/2022 52767	Kim Fineman Discovery Telephone call to TD Bank regarding outstanding document subpoena.	450.00	0.30	135.00	Billable
9/7/2022 52777	Kim Fineman Discovery Correspondence with J. Zagajeski regarding acknowledged of stipulation for protective order for BlockFi production.	450.00	0.30	135.00	Billable
9/7/2022 52766	Kim Fineman Discovery Correspondence with D. Staab, attorney for BlockFi, regarding status of document production.	450.00	0.40	180.00	Billable
9/7/2022 52768	Kim Fineman Discovery Draft letter to TD Bank's Subpoena Department regarding outstanding document subpoena.	450.00	0.40	180.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/7/2022 52781	Kim Fineman Discovery Review and finalize stipulation with BlockFi for protective order.	450.00	0.50	225.00	Billable
9/8/2022 53315	Ryan Witthans Discovery Review UnitedLex invoice; emails with J. Hayes and UnitedLex re same (0.5).	385.00	0.50	192.50	Billable
9/9/2022 53371	Ryan Witthans Discovery Follow-up emails with UnitedLex and team re payment of July invoice (0.2).	385.00	0.20	77.00	Billable
9/10/2022 53391	Ryan Witthans Discovery Email to trustee re UnitedLex invoice (0.2).	385.00	0.20	77.00	Billable
9/12/2022 53323	Ryan Witthans Discovery Follow-up emails with M. Knutsen, J. Hayes, and client re UnitedLex invoice hosting fees; review related invoices and detailed billing records (0.4).	385.00	0.40	154.00	Billable
9/14/2022 52904	Kim Fineman Discovery Correspondence with D. Staab, attorney for BlockFi, regarding entered protective order.	450.00	0.10	45.00	Billable
9/14/2022 52873	Kim Fineman Discovery Revise and resubmit proposed protective order as to BlockFi.	450.00	0.20	90.00	Billable
9/15/2022 52918	Kim Fineman Discovery Review and update discovery tracker for third-party document subpoenas.	450.00	0.40	180.00	Billable
9/15/2022 52939	Kim Fineman Discovery Review correspondence from C. Park with Forge Global in response to document subpoena (.2); Correspondence with K. Everett and J. Zagajeski regarding same (.1).	450.00	0.30	135.00	Billable
9/15/2022 52940	Kim Fineman Discovery Review and analyze document production by Silicon Valley Bank (.5); Correspondence with K. Everett and J. Zagajeski regarding same (.2).	450.00	0.70	315.00	Billable
9/16/2022 53012	Kim Fineman Discovery Correspondence with C. Park of Forge Global confirming no additional Sharespost documents to be produced.	450.00	0.10	45.00	Billable

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Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/16/2022 53014	Kim Fineman Discovery Correspondence with Z. Fedde, attorney for T. Goode, regarding requested further production.	450.00	0.20	90.00	Billable
9/16/2022 53013	Kim Fineman Discovery Correspondence with K. Everett regarding status of discovery items.	450.00	0.40	180.00	Billable
9/19/2022 53088	Kim Fineman Discovery Review correspondence from attorney for T. Goode regarding supplement production (.3); correspondence with K. Everett and J. Zagajeski regarding same (.3).	450.00	0.60	270.00	Billable
9/22/2022 53083	Kim Fineman Discovery Correspondence with attorneys for T. Goode regarding transmittal information for supplemental production.	450.00	0.20	90.00	Billable
9/22/2022 53066	Jennifer Hayes Discovery Review emails from K. Fineman and J. Zagajeski re discovery issues	560.00	0.10	56.00	Billable
9/22/2022 52999	S. Finestone Discovery Emails and tel calls regarding 2004 examinations and litigation targets (.4); review analysis of restitution order (.2)	560.00	0.60	336.00	Billable
9/26/2022 53181	Kim Fineman Discovery Review supplemental production by T. Goode (.4); correspondence with K. Everett and J. Zagajeski regarding same (.2).	450.00	0.60	270.00	Billable
9/27/2022 53173	Kim Fineman Discovery Responsive email to Z. Fedde regarding supplemental production by T. Goode.	450.00	0.10	45.00	Billable
9/29/2022 53240	Kim Fineman Discovery Follow-up correspondence with J. Zagajeski regarding Google Drive access from T. Goode and Google Workspace inquiry.	450.00	0.20	90.00	Billable
9/30/2022 53252	Kim Fineman Discovery Correspondence with J. Zagajeski and Z. Fedde regarding Google Workspace account used by Benja.	450.00	0.10	45.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/30/2022	Jennifer Hayes 53255 Discovery Email to M. Knutsen re Relativity going back live (.1); multiple further emails from and to R. Witthans and M. Knutsen re same (.2)	560.00	0.30	168.00	Billable
10/3/2022	Jennifer Hayes 53467 Discovery Emails to and from M. Knudsen re Relativity issue (.1)	560.00	0.10	56.00	Billable
10/4/2022	Ryan Witthans 53546 Discovery Emails with S. Sklar's counsel re e-discovery procedures (0.3).	385.00	0.30	115.50	Billable
10/5/2022	Ryan Witthans 53566 Discovery Review current and organize past invoices; emails with J. Hayes and trustee re review and payment of current invoice (0.3).	385.00	0.30	115.50	Billable
10/5/2022	Jennifer Hayes 53459 Discovery Review email from R. Witthans re e-discovery issues (.1);	560.00	0.10	56.00	Billable
10/6/2022	Ryan Witthans 53568 Discovery Emails with team re S. Sklar discovery negotiations; review existing productions and compare to requested scope of production (1.3). Phone call with J. Hayes re same (0.1).	385.00	1.40	539.00	Billable
10/10/2022	Ryan Witthans 53556 Discovery Emails with team and UnitedLex re privilege review time/expense estimates (0.7).	385.00	0.70	269.50	Billable
10/10/2022	Jennifer Hayes 53603 Discovery Further analysis re Sklar document requests (.3); multiple emails from and to M. Knutsen, R. Witthans, and DSI re same (.2); further emails and analyses re same (.2); respond to M. Meyers email re discovery issues in context of tolling agreement (.4)	560.00	1.10	616.00	Billable
10/11/2022	Ryan Witthans 53573 Discovery Emails with J. Hayes and M. Meyer re discovery production negotiations; review previous production re same (0.6).	385.00	0.60	231.00	Billable
10/15/2022	Ryan Witthans 53761 Discovery Review UnitedLex invoice; emails with team re same (0.3).	385.00	0.30	115.50	Billable
10/28/2022	Ryan Witthans 54087 Discovery Emails with J. Hayes and M. Meyers re coordination of simultaneous	385.00	1.90	731.50	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	production of documents; review documents; emails with UnitedLex re sharing and receiving document sets (1.9).				
10/31/2022 54089	Ryan Witthans Discovery Emails with J. Hayes and UnitedLex re uploading Sklar production to Relativity (0.5).	385.00	0.50	192.50	Billable
11/3/2022 54672	Ryan Witthans Discovery Review Sklar document status in Relativity and tolling agreement status; emails with J. Hayes re same (0.2).	385.00	0.20	77.00	Billable
11/10/2022 54569	Ryan Witthans Discovery Review UnitedLex invoice; emails with trustee and J. Hayes with comments re same (0.3).	385.00	0.30	115.50	Billable
12/9/2022 54967	Ryan Witthans Discovery Review UnitedLex invoice; emails with trustee and J. Hayes with comments re same (0.2).	385.00	0.20	77.00	Billable
1/9/2023 55769	Ryan Witthans Discovery Review UnitedLex invoice; emails with J. Hayes and trustee re same (0.2).	385.00	0.20	77.00	Billable
2/8/2023 56032	Ryan Witthans Discovery Review UnitedLex invoice; emails with J. Hayes and trustee re same (0.2).	385.00	0.20	77.00	Billable
4/11/2023 57191	Ryan Witthans Discovery Review UnitedLex invoice; emails with J. Hayes and trustee re same (0.2).	385.00	0.20	77.00	Billable
5/2/2023 57371	Jennifer Hayes Discovery Email to K. Everett re e-discovery question (.1)	560.00	0.10	56.00	Billable
5/7/2023 57451	Ryan Witthans Discovery Review UnitedLex invoice; emails with J. Hayes and trustee re same (0.2).	385.00	0.20	77.00	Billable
7/10/2023 58557	Ryan Witthans Discovery Review UnitedLex invoice; emails with J. Hayes re same (0.2).	385.00	0.20	77.00	Billable
7/18/2023 58590	Ryan Witthans Discovery Emails with UnitedLex, J. Hayes, and trustee re payment of outstanding invoices (0.2).	385.00	0.20	77.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/19/2023 58593	Ryan Witthans Discovery Email client re payment of June 2023 UnitedLex invoice (0.1).	385.00	0.10	38.50	Billable
8/7/2023 59255	Ryan Witthans Discovery Review UnitedLex invoice; emails with client re same (0.2).	385.00	0.20	77.00	Billable
8/11/2023 59247	Ryan Witthans Discovery Emails with UnitedLex and trustee re payment of outstanding invoices (0.2).	385.00	0.20	77.00	Billable
8/21/2023 59330	Ryan Witthans Discovery Follow-up emails with trustee and UnitedLex re payment of outstanding invoices pursuant to court order (0.1).	385.00	0.10	38.50	Billable
8/23/2023 59416	Ryan Witthans Discovery Emails with UnitedLex and trustee re payment of outstanding invoices (0.1).	385.00	0.10	38.50	Billable
8/31/2023 59386	Ryan Witthans Discovery Emails with UnitedLex and trustee re overdue invoices; review and update invoice tracker (0.2).	385.00	0.20	77.00	Billable
Total: Discovery			33.30		\$14,691.50
Activity: Discovery - BB					
9/8/2022 52757	Kim Fineman Discovery - BB Correspondence with J. Zagajeski regarding executed acknowledgement of protective order stipulation with BlockFi.	450.00	0.10	45.00	Billable
Total: Discovery - BB			0.10		\$45.00
Activity: Employment					
8/30/2022 52514	Jennifer Hayes Employment Draft application to employ counsel for Chapter 7 Trustee, declaration, and order (.4); emails to S. Finestone re same (.1)	560.00	0.50	280.00	Billable
8/30/2022 52464	S. Finestone Employment Finalize app and declaration re employment of Finestone Hayes as Ch. 7 trustee's counsel and email client re same.	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/31/2022 52485	S. Finestone Employment Emails with client re employment app	560.00	0.10	56.00	Billable
9/1/2022 52686	Jennifer Hayes Employment Review email from K. Everett re employment application and email to S. Finestone regarding same and service of same (.1)	560.00	0.10	56.00	Billable
9/1/2022 52642	S. Finestone Employment Finalize employment app documents.	560.00	0.10	56.00	Billable
9/22/2022 53070	Jennifer Hayes Employment Draft application to employ private investigator and declaration in support (.5); email to K. Everett re same (.1); draft order of employment (.2); review and respond to email from K. Everett re employment application and email to M. Coffino re same (.1)	560.00	0.90	504.00	Billable
9/23/2022 53190	Jennifer Hayes Employment Review and respond to email from M. Coffino re employment application and declaration (.1); emails to and from K. Everett re same (.1); review and finalize employment application and declaration (.1); draft proof of service (.1); review and revise order (.1); file/upload same (n/c)	560.00	0.50	280.00	Billable
9/30/2022 53251	Jennifer Hayes Employment Review Coffino Investigations employment order and email to M. Coffino re same (.1)	560.00	0.10	56.00	Billable
2/28/2023 56387	Jennifer Hayes Employment Email to K. Everett re tax professional name and firm for employment application (.1); review and respond to email from K. Everett re tax professional engagement agreement (.1); review engagement agreement and further emails from and to K. Everett re same (.1); draft employment agreement for tax attorneys (.2); draft declaration in support (.3); email to K. Everett re drafts and re additional facts for same (.1)	560.00	0.90	504.00	Billable
3/7/2023 56483	Jennifer Hayes Employment Follow up email to K. Everett re status of employment application for tax professional (.1)	560.00	0.10	56.00	Billable
3/10/2023 56750	Ryan Witthans Employment Phone call with J. Hayes re employment of tax professionals (0.1). Review employment application and related documents; emails with tax professionals re same (0.3).	385.00	0.40	154.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
3/10/2023 56509	Jennifer Hayes Employment Review email from K. Everett re tax professional employment application and email to, and telephone call with, R. Witthans re same (.1)	560.00	0.10	56.00	Billable
3/13/2023 56753	Ryan Witthans Employment Follow-up emails with tax professionals re employment (0.1).	385.00	0.10	38.50	Billable
3/15/2023 56757	Ryan Witthans Employment Follow-up email to tax professionals; emails with J. Hayes re same (0.1).	385.00	0.10	38.50	Billable
3/15/2023 56560	Jennifer Hayes Employment Emails to and from R. Witthans re status of employment application of tax attorney (.1); further emails from and to R. Witthans re same and email to S. Brown re same and re need to file promptly (.1)	560.00	0.20	112.00	Billable
3/16/2023 56773	Ryan Witthans Employment Emails and attempts to call tax professionals; revise application to employ tax professional; draft order approving employment (0.7).	385.00	0.70	269.50	Billable
3/16/2023 59395	Ryan Witthans Employment Emails and attempts to call tax professionals; revise application to employ tax professional; draft order approving employment (0.7).	385.00	0.70	269.50	Billable
3/17/2023 56765	Ryan Witthans Employment Receive fully executed engagement agreement from tax professionals; amend employment application and order approving employment (0.3).	385.00	0.30	115.50	Billable
3/20/2023 56777	Ryan Witthans Employment Emails with tax attorneys re employment order (0.1).	385.00	0.10	38.50	Billable
Total: Employment			6.20		\$3,052.00
<u>Activity: Fee App</u>					
8/26/2022 52421	Jennifer Hayes Fee App Further revisions to pre-bill to take account of ND Cal Guidelines re same (.7); telephone call with S. Finestone re same and continued revisions (.5)	560.00	1.20	672.00	Billable
8/26/2022 52400	S. Finestone Fee App Work with J. Hayes on interim fee app.	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/30/2022 52497	Jennifer Hayes Fee App Draft first interim fee application (1.0)	560.00	1.00	560.00	Billable
9/2/2022 52681	Jennifer Hayes Fee App Continue drafting first interim fee application (1.0)	560.00	1.00	560.00	Billable
9/6/2022 52696	Jennifer Hayes Fee App Continue drafting, review, and revising fee application, related declaration, and notice of hearing (3.4); emails to and from K. Everett and J. Zagajeski re same (.1); email to S. Finestone re same (.1)	560.00	3.60	2,016.00	Billable
9/6/2022 52662	S. Finestone Fee App Edits to draft first interim fee application and supporting declaration.	560.00	1.30	728.00	Billable
9/7/2022 52764	Jennifer Hayes Fee App Review and revise first interim fee application and declaration in support (.4); emails from and to S. Finestone re same (.1); further revisions to same (.2); email to K. Everett and J. Zagajeski re same (.1)	560.00	0.80	448.00	Billable
9/9/2022 52746	S. Finestone Fee App Revise notice of hearing on fee apps.	560.00	0.10	56.00	Billable
9/9/2022 53319	Ryan Witthans Fee App Review and revise first interim fee application; emails with J. Hayes re same (1.3). Research service requirements; emails with J. Hayes and call with S. Finestone re same (0.5). Draft certificate of service for NEF recipients; emails with team re same (0.4).	385.00	2.20	847.00	Billable
9/9/2022 52817	Jennifer Hayes Fee App Review, revise and finalize first interim fee application (.3); emails from and to J. Zagajeski and K. Everett re same (.1); emails from and to R. Witthans re same and re noticing issues and analysis of same (.2); telephone call and texts/ emails with S. Finestone re same (.1); email to K. Everett and J. Zagajeski re filed fee applications (.1)	560.00	0.80	448.00	Billable
9/12/2022 53324	Ryan Witthans Fee App Review certificate of U.S. Mail service; emails with team re same (0.2). Legal research re payment of pre-conversion administrative claims; analyze billing records re same (1.2).	385.00	1.40	539.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/31/2023 59463	Jennifer Hayes Fee App Begin drafting second interim fee application, declaration, and order (1.2); communications with S. Finestone re same (.1)	560.00	1.30	728.00	Billable
Total: Fee App			15.10		\$7,826.00
<u>Activity: Investigation</u>					
9/16/2022 52951	S. Finestone Investigation Emails with client re status of investigations and related matters.	560.00	0.10	56.00	Billable
9/22/2022 53059	Jennifer Hayes Investigation Telephone call with M. Coffino re investigative issues (.1); research re individual defendant litigation targets (1.2); emails to and from R. Witthans re same (.2); emails to K. Everett and J. Zagajeski re same (.2); review and respond to email from K. Everett re same (.1); further research and investigation into G. Mott (.2); emails from and to K. Everett re same (.1); emails from and to K. Everett regarding G. Mott and next steps (.2); telephone call with S. Finestone re same (.1); email follow up question to K. Everett re same (.1); analysis of criminal restitution judgment versus claims filed against the bankruptcy estate and memo to file re same (1.3); email to S. Finestone re same (.1)	560.00	3.90	2,184.00	Billable
9/23/2022 53192	Jennifer Hayes Investigation Analysis re possible claims against A. Chapin and emails from and to S. Finestone re same (.2); legal research re same (.5); emails to and S. Finestone re same (.1); emails from and to M. Coffino re asset searches (.1); emails to and from K. Everett re same (.1); Lexis research re Chapin for purposes of background info for asset search (.4); email to M. Coffino re same (.1); further emails from and to M. Coffino and M. Coffino regarding Chapin asset research (.1)	560.00	1.60	896.00	Billable
10/3/2022 53474	Jennifer Hayes Investigation Review and revise memorandum re estate's litigation claims against A. Chapin (.9); emails to and from S. Finestone re same (.1); further revisions to memo (.3); review and analysis of asset search memos for possible litigation targets (.2); fact and legal research re additional claims (2.3); Zoom with J. Zagajeski and S. Finestone re litigation claims and strategy (.4)	560.00	4.20	2,352.00	Billable
10/4/2022 53478	Jennifer Hayes Investigation Review and respond to emails from J. Zagajeski and K. Everett re asset search on D. Weiner (.1); emails from and to K. Everett regarding additional asset search (.1); email to M. Coffino re additional requested asset searches (.1); review and respond to email from M. Coffino re same (.1); emails from and to S. Finestone re claims against Chapin and	560.00	1.50	840.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	communications with creditors re same (.1); emails from and to K. Everett re same (.1); draft status report re various litigation matters and email to K. Everett and J. Zagajeski re same (.9)				
10/5/2022 53472	Jennifer Hayes Investigation Review and respond to email from K. Banner re Jomboy tolling agreement (.1); finalize and file Jomboy stipulation (.1); emails from and to K. Banner's office re same (.1); review email from S. Finestone re Goode's new address and email to M. Coffino re same (.1); review and analysis of asset report for D. Weiner (.2); emails from and to M. Coffino and to K. Everett re same (.1)	560.00	0.70	392.00	Billable
10/6/2022 53576	Jennifer Hayes Investigation Further review and analysis of asset report re Weiner (.1); emails from and to K. Everett re same (.1); email to M. Coffino re same (.1); review and respond to email from M. Coffino re asset report on T. Goode and review and analysis of same (.1); email to K. Everett re same (.1); review and analysis of M. Meyers proposed tolling agreement terms (.3); email to R. Witthans re same (.1); email to K. Everett and J. Zagajeski re same (.2); review and respond to email from R. Witthans re same and review email from K. Everett re same (.1); continued legal research re defenses to anticipated claims (.6); emails from and to R. Witthans re Sklar discovery requests and analysis re same (.2); emails from and to K. Everett re Sklar tolling agreement (.1); further analysis re Sklar claims and strategy (.4); telephone call with E. Everett re same (.2); email to M. Knutsen re Sklar's document request (.2); review and analysis of email from M. Knutsen re Sklar document request and emails from and to M. Knutsen re same (.2); further emails from and to M. Knutsen re same (.1); review signed order re tolling agreement and email to Jomboy's counsel re same (.1); further research and analysis re claims against directors (1.2); telephone call with R. Witthans re same and re discovery issues and tolling agreements (.2); telephone call with S. Finestone re litigation strategy (.2); review and respond to email from K. Everett re Goode asset report (.1); further legal research re claims and theories of recovery (.9)	560.00	5.90	3,304.00	Billable
10/7/2022 53523	Jennifer Hayes Investigation Communications with J. Lee re complaint against former directors and employees (.2); review email from M. Knutsen re Sklar's requested document search and expense/timing of same (.1); email to M. Meyers re same (.2); email to K. Everett and J. Zagajeski re same (.1); draft email of issues re possible claims (.4); email to J. Lee re same (.1); emails from and to J. Zagajeski re potential claims against Mott and analysis re same (.2)	560.00	1.30	728.00	Billable
10/8/2022 53562	Jennifer Hayes Investigation Further analyses re litigation claims and communications with J. Lee re same	560.00	0.30	168.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/9/2022 53600	Jennifer Hayes Investigation Draft email to T. Goode's counsel re standstill agreement (.1)	560.00	0.10	56.00	Billable
10/10/2022 53981	Johnson Lee Investigation Communications with J.Hayes re additional factual background for claims against Benja insiders (0.2).  Received and reviewed communication from S.Finestone re facts supporting possible claim against T.Goode (0.1).  Reviewed transcript and notes of 2004 exam of A.Chapin (0.8). Reviewed T.Goode's 2004 exam transcript (1.5), relevant portions of J.Alouf's affidavit and notes (0.4), criminal complaints against A.Chapin (1.0), A.Chapin's plea agreement (0.7), and communications on file (1.5) re factual allegations against T.Goode, D.Weiner, and S.Sklar for their roles in fraudulent scheme.	385.00	6.20	2,387.00	Billable
10/10/2022 53601	Jennifer Hayes Investigation Revise email to T. Goode's counsel re tolling agreement and send same (.1); email to K. Everett and J. Zagajeski re same (.1); follow up email to D. Weiner re same (.1); follow up email to K. Everett and J. Zagajeski re same (.1); review and analysis of document production proposals from M. Meyers (.2); email to K. Everett and J. Zagajeski re same (.1); review and analysis of T. Goode lawyer's response to tolling agreement request (.3); email to K. Everett and J. Zagajeski re same (.1); review and respond to email from K. Everett re same (.1); emails from and to K. Everett re scheduling a call to discuss the Sklar production (.1); telephone call with K. Everett re same (.1); emails from and to M. Knutsen re cost of document production to Sklar (.1); further background research re Goode and emails from and to J. Lee re same (.3); email to J. Merritt re Goode tolling agreement (.2); follow up email to K. Everett and J. Zagajeski re same (.1); emails from and to S. Finestone and J. Lee re same (.1); further review and analysis of 2004 examination transcript of Goode (.5); email to T. Merritt re same and re continued request to sign tolling agreement (.1); emails from and to M. Meyers re scheduling a call to continue discussing terms of tolling agreement (.1)	560.00	2.90	1,624.00	Billable
10/11/2022 53982	Johnson Lee Investigation Communications with J.Hayes re researching factual details and drafting of complaint (0.1).  Additional review of documents and communications on file re S.Sklar's role as director and investments in Benja (1.2).  Researched adverse interest exception to in pari delicto defense, and exception to exception (1.5).  Drafted analysis of relevant facts re D.Weiner's role in Benja and	385.00	4.90	1,886.50	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Chapin-related companies, transfers to D.Weiner and possible part in fraudulent scheme (0.4).				
	Reviewed communications with trustee regarding interview with D.Weiner, claims made by D.Weiner compared with trustee's evidence against D.Weiner (0.2).				
	Reviewed additional research materials re liability of Ponzi scheme insiders from J.Hayes (0.5).				
	Began drafting complaint against Benja insiders, laying out causes of action and supporting factual allegations (1.0).				
10/11/2022	Jennifer Hayes 53530 Investigation	560.00	4.30	2,408.00	Billable
	Listen to voicemail from D. Weiner re tolling agreement request (.1); telephone call with D. Weiner re same and re his role at Benja (.5); further analysis re estate's potential claims against D. Weiner (.6); follow up email to M. Meyers re call to discuss Sklar tolling agreement (.1); telephone call with M. Meyers and notes to file re same (.2); review and respond to email from R. Witthans re same (.1); telephone call with S. Finestone re Sklar tolling agreement issues (.1); draft email to K. Everett and J. Zagajeski regarding estate's possible claims against Weiner (.5); review and analysis of Sklar document production questions and emails from R. Witthans and M. Meyers re same (.2); review email from K. Everett re D. Weiner and email to S. Finestone re same (.1); review emails from M. Knutsen and R. Witthans re ESI issues (.1); further analysis re M. Meyers discovery requests (.2); email to R. Witthans re same (.1); review and analysis of MHC list of search terms (.1); email to S. Finestone re Sklar document production issues (.1); review and analysis of revised terms of Sklar tolling agreement (.3); email to M. Meyers re same (.1); review and respond to email from K. Everett re Weiner claims (.1); email to J. Lee re same (.1); further email to K. Everett re same (.1); review and revise Goode tolling agreement (.1); emails from and to Merritt Law Offices re same (.1); review and respond to email from J. Lee re facts underlying potential Weiner claim and additional research re same (.3)				
10/12/2022	Johnson Lee 53983 Investigation	385.00	7.90	3,041.50	Billable
	Communications with J.Hayes re draft complaint, trustee's allegations against D.Weiner, evidence against S.Sklar, and in pari delicto defense and standing (0.2).				
	Continued draft of complaint against Benja insiders (0.7).				
	Call with J.Hayes analyzing potential factual allegations and claims against S.Sklar, T.Goode, and D.Weiner, and applicability of potential defenses (1.0).				
	Call with S.Finestone re claims against Benja insiders and potential defenses, proposal re pursuing claims (0.3).				

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	Drafted analysis of facts re S.Sklar and T.Goode, application of potential claims of liability as fiduciaries, and potential defenses (2.8). Follow-up communications with J.Hayes and S.Finestone (0.1).				
	Reviewed trustee's evidence against D.Weiner (0.3). Analyzed case law re recovery of fraudulent transfers from employees of a Ponzi scheme (1.0).				
	Accessed Relativity, and began search and review of additional documents supporting factual allegations of D.Weiner's role in aiding and abetting A.Chapin and the Benja fraudulent scheme (1.5).				
10/12/2022 53649	Jennifer Hayes Investigation Emails from and to M. Meyers re tolling agreement (.1); follow up email to T. Goode's counsel regarding tolling agreement (.1); further analysis re potential claims against additional litigation targets (1.3); telephone call with J. Lee re same (1.0); email analysis re claims and defenses to K. Everett and J. Zagajeski (.3); review and revise Sklar tolling agreement (.3); email to M. Meyers re same (.1); emails from and to J. Lee and S. Finestone regarding legal and factual analysis of claims (.2)	560.00	3.40	1,904.00	Billable
10/13/2022 53998	Johnson Lee Investigation Refined search and continued reviewing Relativity for documents re D.Weiner's role in aiding and abetting A.Chapin and the Benja fraudulent scheme (7.5).	385.00	8.10	3,118.50	Billable
	Attention to communications re developments in tolling agreement negotiations with D.Weiner and directions to draft complaint (0.1).				
	Began outlining causes of action against D.Weiner (0.5).				
10/13/2022 53640	Jennifer Hayes Investigation Review and analysis of memorandum from J. Lee regarding estate's potential litigation claims (.4); emails to and from K. Everett re same (.1); emails from and to Z. Fedde re Goode tolling agreement (.1); finalize and file same and follow up email to Z. Fedde re same (.1); revise order on Goode tolling agreement (.1); telephone call with S. Finestone re claims against D. Weiner (.1); telephone call with D. Weiner re same (.1); email to K. Everett and J. Zagajeski re same (.1); review and revise Sklar tolling agreement to incorporate M. Meyers edits (.2); review and revise order (.1); email to M. Meyers re revised stipulation and draft of order (.1); further analysis re potential claims against D. Weiner and emails from and to S. Finestone re same (.4); further emails from and to M. Meyers re tolling agreement (.1); finalize and file stipulation and upload order (n/c); listen to voicemail from K. Everett re D. Weiner claims and further analysis re same (.3); review and respond to emails from J. Lee re same (.2); telephone call with K. Everett re estate's claims against D. Weiner (.2); further analysis re same and legal research re same (.3)	560.00	3.00	1,680.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
10/14/2022 53643	Jennifer Hayes Investigation Review and respond to email from J. Lee regarding estate's claims against D. Weiner (.2); further emails from and to J. Lee re status of drafting of complaint (.1); review and revise same (.9); emails from and to J. Lee re same (.1); draft adversary proceeding cover sheet (.2); email to K. Everett re draft complaint (.1); telephone call with K. Everett re same (.1)	560.00	1.70	952.00	Billable
10/28/2022 53968	Jennifer Hayes Investigation Email to R. Witthans re simultaneous turnover of documents to S. Sklar and deadline for same (.1); analysis re same and multiple further emails from and to R. Witthans re same (.2); review emails from from M. Meyers re same (.1); further emails from and to R. Witthans re Sklar documents (.1)	560.00	0.50	280.00	Billable
10/29/2022 53975	Jennifer Hayes Investigation Review and respond to email from M. Meyers re document productions (.1)	560.00	0.10	56.00	Billable
10/31/2022 53966	Jennifer Hayes Investigation Further emails from and to R. Witthans re Sklar documents (.1)	560.00	0.10	56.00	Billable
11/3/2022 54095	Jennifer Hayes Investigation Email to R. Witthans re tolling agreements status and next steps (.1)	560.00	0.10	56.00	Billable
11/7/2022 54165	Jennifer Hayes Investigation Review documents produced by S. Sklar	560.00	2.90	1,624.00	Billable
11/18/2022 54390	Jennifer Hayes Investigation Further review and analysis of Sklar documents and estate's potential claims (1.8); email recommendation to K. Everett re same (.3)	560.00	1.90	1,064.00	Billable
11/22/2022 54482	Jennifer Hayes Investigation Telephone call with S. Finestone re evaluation of estate's potential claims against S. Sklar (.1)	560.00	0.10	56.00	Billable
11/29/2022 54509	Jennifer Hayes Investigation Follow up email to K. Everett re estate's potential claims against Sklar (.1); telephone call with K. Everett re same (.2)	560.00	0.30	168.00	Billable
12/2/2022 54750	Jennifer Hayes Investigation Email to K. Fineman re status of obtaining documents from T. Goode (.1); review and respond to email from K. Fineman re same and email to K. Everett re same (.1); emails from and to K. Everett re estate's potential	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	claims against S. Sklar (.1); telephone call with K. Everett re same (.1)				
12/9/2022 54972	Jennifer Hayes Investigation Emails from and to S. Finestone re contact information for Busey and Empowerment re Sklar (.1); emails from and to R. Witthans re UnitedLex documents (.1)	560.00	0.20	112.00	Billable
12/13/2022 55006	Jennifer Hayes Investigation Email to J. Switzer and M. Stern re estate's claims against S. Sklar and request for evidence to establish viable claims if such evidence exists (.5)	560.00	0.50	280.00	Billable
1/6/2023 55344	Jennifer Hayes Investigation Review and analysis of email from M. Meyers re estate's potential claims against S. Sklar (.2); emails from and to K. Everett re same (.1); email to M. Meyers re his inquiry (.1)	560.00	0.40	224.00	Billable
2/8/2023 56009	Jennifer Hayes Investigation Review and analysis of Jomboy-produced documents and memo to file re same (2.7); email to J. Zagajeski regarding same (.1)	560.00	2.80	1,568.00	Billable
2/9/2023 55999	Jennifer Hayes Investigation Further review and analysis of facts re potential claims against Jomboy (.6); emails from and to J. Zagajeski re same (.2); further review and analysis of background facts (.3); follow up email to J. Zagajeski re same (.1)	560.00	1.20	672.00	Billable
2/10/2023 56211	Ryan Witthans Investigation Review and analyze DocuSign records and Relativity documents re timing of SAFE agreements; follow-up emails with J. Hayes re same (1.4).	385.00	1.40	539.00	Billable
2/10/2023 56094	Jennifer Hayes Investigation Follow up email to J. Zagajeski re Jomboy SAFE issue (.1)	560.00	0.10	56.00	Billable
2/10/2023 56095	Jennifer Hayes Investigation Further analysis re Jomboy SAFE agreement and possible claims re same (.6); emails to and from R. Witthans re same (.1); further analysis re same (.4); further emails from and to R. Witthans re same (.2)	560.00	1.30	728.00	Billable
2/13/2023 56231	Ryan Witthans Investigation Emails with J. Hayes re searches of Relativity document repository re timing of Jomboy investments (0.1).	385.00	0.10	38.50	Billable

9/5/2023  
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Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/13/2023 56165	Jennifer Hayes Investigation Further fact research re potential claims against Jomboy (.6); emails to and from R. Witthans re same (.2); email to J. Zagajeski re same (.1)	560.00	0.90	504.00	Billable
2/14/2023 56120	Jennifer Hayes Investigation Review and analysis of email from J. Zagajeski re estate's potential claims against Jomboy (.2); legal research re same (.7)	560.00	0.90	504.00	Billable
2/16/2023 56137	Jennifer Hayes Investigation Review and respond to email from J. Zagajeski re potential claim against Jomboy (.1)	560.00	0.10	56.00	Billable
3/30/2023 56817	Jennifer Hayes Investigation Further analysis of estate's potential claims against Jomboy (.6); email to S. Finestone re same (.1); review and respond to email from S. Finestone re same (.1); texts to and from K. Fineman re Jomboy complaint (.1); telephone calls with K. Fineman re same (.3)	560.00	1.20	672.00	Billable
4/14/2023 57072	Jennifer Hayes Investigation Telephone call with K. Fineman re Jomboy tolling agreement and next steps (.1); review filed tolling agreement and order approving same (.1)	560.00	0.20	112.00	Billable
Total: Investigation			79.70		\$39,627.00
Activity: Lit- Peters					
8/26/2022 52387	S. Finestone Lit- Peters Emails with counsel for defendant and client	560.00	0.10	56.00	Billable
8/30/2022 52465	S. Finestone Lit- Peters Discuss settlement with client and draft email of terms to forward to defendant's counsel.	560.00	0.40	224.00	Billable
9/1/2022 52640	S. Finestone Lit- Peters Emails to counsel for defendant with settlement offer and follow up tel call.	560.00	0.30	168.00	Billable
9/5/2022 52660	S. Finestone Lit- Peters Emails and tel call with counsel for Peters (.4); email to client re settlement options and trial issues (.2)	560.00	0.60	336.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/8/2022 52734	S. Finestone Lit- Peters Tel call with Peters' counsel re settlement and possible stipulation to facts and email to client re same.	560.00	0.40	224.00	Billable
9/9/2022 52738	S. Finestone Lit- Peters Discuss settlement with Kyle Everett and follow up call with counsel for Peters	560.00	0.50	280.00	Billable
9/14/2022 52859	S. Finestone Lit- Peters Emails re settlement.	560.00	0.10	56.00	Billable
9/19/2022 52967	S. Finestone Lit- Peters Review counteroffer from Peters, email and tel call with client re same and emails with opposing counsel re final offer.	560.00	0.40	224.00	Billable
9/22/2022 52998	S. Finestone Lit- Peters Review latest offer from Peters and email to Kyle Everett re same.	560.00	0.10	56.00	Billable
9/23/2022 53191	Jennifer Hayes Lit- Peters Review and analysis of settlement terms proposed and emails re same	560.00	0.20	112.00	Billable
9/28/2022 53204	S. Finestone Lit- Peters Emails with client and counsel for Peters re settlement.	560.00	0.20	112.00	Billable
10/3/2022 53434	S. Finestone Lit- Peters Email with judge's clerk re settlement	560.00	0.10	56.00	Billable
10/5/2022 53461	Jennifer Hayes Lit- Peters Telephone call with S. Finestone re Peters settlement agreement (.1); emails from and to S. Finestone re same and review and analysis of same (.1)	560.00	0.20	112.00	Billable
10/18/2022 53714	Jennifer Hayes Lit- Peters Email to S. Finestone re status of settlement agreement (.1); draft settlement agreement (1.8); communications with S. Finestone re same (.1)	560.00	2.00	1,120.00	Billable
10/18/2022 53684	S. Finestone Lit- Peters Review settlement agreement draft.	560.00	0.50	280.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/19/2022 53744	Jennifer Hayes Lit- Peters Review proposed revisions to draft settlement agreement and emails from and to S. Finestone re same (.2); further review of draft (.2); email to K. Everett and J. Zagajeski re same (.1)	560.00	0.50	280.00	Billable
10/26/2022 53882	Jennifer Hayes Lit- Peters Emails from and to S. Finestone re status of Peters settlement (.1); review emails from S. Finestone and K. Everett re same (.1)	560.00	0.20	112.00	Billable
11/9/2022 54216	S. Finestone Lit- Peters Review client comments re settlement agreement.	560.00	0.30	168.00	Billable
11/15/2022 54297	S. Finestone Lit- Peters Finalize comments to latest settlement agreement and email to Kyle Everett re same.	560.00	0.40	224.00	Billable
12/16/2022 54999	S. Finestone Lit- Peters Tel call with counsel for Peters re status of settlement agreement.	560.00	0.30	168.00	Billable
12/27/2022 55166	S. Finestone Lit- Peters Emails with court and opposing counsel re case status.	560.00	0.20	112.00	Billable
12/29/2022 55174	S. Finestone Lit- Peters Review redline to settlement agreement received from defense counsel; email to client re same.	560.00	0.40	224.00	Billable
1/11/2023 55357	S. Finestone Lit- Peters Discuss settlement agreement edits from Peters with client and email counsel for Peters re same.	560.00	0.30	168.00	Billable
1/12/2023 55393	S. Finestone Lit- Peters Discuss settlement agreement with Kyle and email to Peters' counsel re same.	560.00	0.40	224.00	Billable
1/17/2023 55504	S. Finestone Lit- Peters Emails with counsel for Peters re newly levied tax liens and execution of agreement.	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
1/26/2023 55629	S. Finestone Lit- Peters Tel call with counsel for Peters (.2); emails re revised settlement proposal from Peters and email to client re same (.2)	560.00	0.40	224.00	Billable
1/27/2023 55698	S. Finestone Lit- Peters Emails re revised settlement offer from Peters.	560.00	0.20	112.00	Billable
1/30/2023 55733	S. Finestone Lit- Peters Tel call with counsel for Peters re breakdown of settlement negotiations and intention to place matter back on court calendar.	560.00	0.20	112.00	Billable

Total: Lit- Peters			10.20		\$5,712.00
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Activity: Litigation

9/1/2022 52677	Jennifer Hayes Litigation Telephone call with K. Everett, J. Zagajeski, S. Finestone, and R. Witthans regarding litigation claims and strategy (1.1); notes to file re same (.4); email to K. Everett, J. Zagajeski and S. Finestone re same (.1)	560.00	1.60	896.00	Billable
9/17/2022 53011	Jennifer Hayes Litigation Emails from and to K. Everett, K. Fineman, and S. Finestone re status of various litigation and litigation related matters (.2)	560.00	0.20	112.00	Billable
9/18/2022 53024	Jennifer Hayes Litigation Emails from and to K. Everett re litigation matters (.1)	560.00	0.10	56.00	Billable
9/19/2022 53087	Jennifer Hayes Litigation Litigation planning call with K. Everett, J. Zagajeski and S. Finestone regarding next steps (.3); emails from and to B. Reed re BDRP mediation (.1); telephone call with B. Reed re same (.1)	560.00	0.50	280.00	Billable
9/20/2022 53113	Jennifer Hayes Litigation Background research for tolling agreements (.2); emails to and from S. Finestone re same (.1); emails to and from R. Witthans re same (.1)	560.00	0.40	224.00	Billable
9/21/2022 53045	Jennifer Hayes Litigation Analysis re tolling agreement issues and 546 deadline and telephone call with R. Witthans re same (.4); review and respond to email from R. Witthans re drafts of tolling agreement and order (.1); review and revise draft tolling agreement and order (.6); email to R. Witthans re same (.1)	560.00	1.20	672.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
9/22/2022 53101	Jennifer Hayes Litigation Review revised drafts of tolling agreement and order (.1); emails from and to R. Witthans re same (.1); email to K. Everett re private investigator and status of contacting same (.1); review and respond to email from K. Everett re same (.1)	560.00	0.40	224.00	Billable
9/28/2022 53250	Jennifer Hayes Litigation Continue legal research and drafting of memorandum regarding effect of federal restitution judgment on estate's claims against A. Chapin (.8); email to R. Witthans re tolling agreements (.1); telephone call with R. Witthans re same (.2); further analysis re and further emails from and to R. Witthans and K. Fineman re same (.1)	560.00	1.20	672.00	Billable
9/29/2022 53217	Jennifer Hayes Litigation Emails from and to R. Witthans re tolling agreements (.2); review and revise same (.3); telephone call with S. Stein re same (.1); follow up email to S. Stein re same (.1); email to S. Sklar re tolling agreement (.2); emails from and to S. Finestone re same (.1); voicemail to M. Meyers re same and emails to and from M. Meyers re same (.1); multiple emails to K. Everett and J. Zagajeski re tolling agreements (.1); email to N. Foppe re same (.2); email to K. Everett and J. Zagajeski re D. Weiner (.1); email to D. Weiner re tolling agreement (.1); research re T. Goode contact information (.2); emails to and from S. Finestone re same (.1); review and respond to email from K. Everett regarding estate's claims against A. Chapin (.2); emails from and to S. Stein re tolling agreement (.1); emails from and to N. Foppe re same (.1); review and revise order on stipulation re N. Foppe (.1)	560.00	2.40	1,344.00	Billable
10/5/2022 53661	S. Finestone Litigation Emails re potential litigation against fiduciaries.	560.00	0.30	168.00	Billable
10/10/2022 53518	S. Finestone Litigation Emails with J. Hayes re potential claims against employees	560.00	0.30	168.00	Billable
10/12/2022 53610	S. Finestone Litigation Discussion with Johnson Lee re potential claims against directors and review memo re same.	560.00	0.50	280.00	Billable
10/13/2022 53620	S. Finestone Litigation Discuss potential claims against D. Weiner and emails re same.	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
10/31/2022 53972	Jennifer Hayes Litigation Listen to voicemail from attorney for D. Weiner and emails to and from R. Witthans re same (.1)	560.00	0.10	56.00	Billable
1/27/2023 55697	S. Finestone Litigation Review waterfall analysis from MHC and discuss same with J. Hayes.	560.00	0.50	280.00	Billable
2/10/2023 56059	Jennifer Hayes Litigation Review email from R. Witthans re phone calls with D. Weiner re adversary proceeding and possible settlement (.1); emails from and to K. Everett re same (.1); further emails from and to R. Witthans and K. Everett re same (.1)	560.00	0.30	168.00	Billable
3/29/2023 56723	Jennifer Hayes Litigation Telephone call with S. Finestone re status of estate's potential claims against Jomboy (.1)	560.00	0.10	56.00	Billable
3/30/2023 56941	S. Finestone Litigation Emails re potential claims against Jomboy	560.00	0.20	112.00	Billable
3/31/2023 56887	Kim Fineman Litigation Review correspondence regarding claim by the estate against Jomboy.	450.00	1.60	720.00	Billable
4/3/2023 56891	Jennifer Hayes Litigation Review and revise draft email to D. Weiner and emails from and to R. Witthans re same (.2)	560.00	0.20	112.00	Billable
4/5/2023 56929	Jennifer Hayes Litigation Review and analysis of draft response to D. Weiner (.1); emails from and to R. Witthans re same (.1); review further emails from K. Everett and R. Witthans re same (.1); review and analysis of multiple further emails re D. Weiner's about face and efforts to revive old settlement offer (.2)	560.00	0.50	280.00	Billable
4/28/2023 57324	Kim Fineman Litigation Correspondence with K. Bannerman, attorney for Jomboy, to follow up regarding review of draft adversary complaint.	450.00	0.20	90.00	Billable
5/10/2023 57500	Kim Fineman Litigation Correspondence with K. Banner regarding furtherance of settlement discussions with Jomboy and timing for response.	450.00	0.10	45.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/22/2023 57678	Kim Fineman Litigation Correspondence with K. Banner to follow-up regarding anticipated proposal from Jomboy.	450.00	0.20	90.00	Billable
5/24/2023 57684	Kim Fineman Litigation Correspondence with K. Everett and J. Zagajeski regarding offer from Jomboy.	450.00	0.20	90.00	Billable
5/24/2023 57683	Kim Fineman Litigation Review offer letter from K. Banner, counsel for Jomboy.	450.00	0.30	135.00	Billable
5/26/2023 57608	Kim Fineman Litigation Confer with J. Hayes regarding settlement discussions with Jomboy.	450.00	0.10	45.00	Billable
5/26/2023 57702	Kim Fineman Litigation Draft letter to K. Banner regarding settlement discussions with Jomboy.	450.00	0.70	315.00	Billable
5/30/2023 57613	Kim Fineman Litigation Correspondence with K. Everett regarding draft response to Jomboy.	450.00	0.20	90.00	Billable
5/30/2023 57673	Kim Fineman Litigation Revise and finalize letter to K. Banner in response to settlement proposal from Jomboy.	450.00	0.30	135.00	Billable
6/13/2023 58016	Kim Fineman Litigation Correspondence and telephone conference with K. Everett regarding response by Jomboy to request for additional information.	450.00	0.20	90.00	Billable
6/13/2023 58015	Kim Fineman Litigation Review correspondence from Jomboy's attorneys in response to request for additional information.	450.00	0.40	180.00	Billable
6/20/2023 58058	Kim Fineman Litigation Review written settlement communications (.5); Telephone call with K. Everett regarding next steps and legal research (.1).	450.00	0.60	270.00	Billable
6/20/2023 58059	Kim Fineman Litigation Legal research regarding defenses asserted by Jomboy.	450.00	1.70	765.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/20/2023 58061	Kim Fineman Litigation Review additional documents produced by Jomboy on June 13, 2023.	450.00	1.80	810.00	Billable
6/22/2023 58144	Kim Fineman Litigation Telephone call with J. Zagajeski regarding bank accounts used by Benja for preparation of response to Jomboy.	450.00	0.20	90.00	Billable
6/28/2023 58202	Kim Fineman Litigation Confer with J. Hayes regarding Jomboy negotiations and research.	450.00	0.50	225.00	Billable
6/28/2023 58197	Kim Fineman Litigation Review caselaw and begin framing responsive letter to Jomboy's counsel regarding alleged 550(b) affirmative defense.	450.00	1.40	630.00	Billable
6/28/2023 58199	Jennifer Hayes Litigation Prepare for all with K. Fineman re Jomboy litigation strategy (.3); telephone call with K. Fineman re same (.5)	560.00	0.80	448.00	Billable
6/29/2023 58248	Kim Fineman Litigation Further legal research in preparation for response to Jomboy in furtherance of settlement discussions.	450.00	2.30	1,035.00	Billable
6/30/2023 58272	Kim Fineman Litigation Draft letter to Jomboy's counsel outlining legal arguments (2.6); Correspondence with K. Everett, J. Zagajeski and J. Hayes regarding same (.2).	450.00	2.80	1,260.00	Billable
6/30/2023 58268	Jennifer Hayes Litigation Review and analysis of draft letter to Jomboy's counsel (.2); emails from and to K. Fineman re same (.1); review and respond to further email from K. Fineman re same (.1)	560.00	0.40	224.00	Billable
7/5/2023 58330	Kim Fineman Litigation Follow up correspondence with K. Everett regarding proposed response to Jomboy's counsel (.1); Telephone conference with K. Everett regarding same (.1).	450.00	0.20	90.00	Billable
7/5/2023 58338	Kim Fineman Litigation Review and finalize letter to Jomboy's counsel addressing alleged good faith transferee defense.	450.00	0.60	270.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
7/10/2023 58391	Jennifer Hayes Litigation Email to K. Fineman re Jomboy response to opposing counsel re litigation issues (.1); review and respond to email from K. Fineman re same (.1)	560.00	0.20	112.00	Billable
7/18/2023 58539	Kim Fineman Litigation Correspondence with K. Banner, counsel for Jomboy, regarding request for extension for requested valuations (.2); Correspondence with K. Everett regarding same (.1).	450.00	0.30	135.00	Billable
7/19/2023 58535	Jennifer Hayes Litigation Review emails from Jomboy's counsel, K. Fineman, and K. Everett re further extension of time to obtain valuation of shares (.1)	560.00	0.10	56.00	Billable
8/2/2023 58939	Kim Fineman Litigation Correspondence with K. Banner regarding Jomboy's response for request for information (.1); Correspondence with J. Hayes regarding same (.1).	450.00	0.20	90.00	Billable
8/2/2023 58852	Jennifer Hayes Litigation Emails from and to K. Fineman re Jomboy valuation (.1)	560.00	0.10	56.00	Billable
8/3/2023 58944	Kim Fineman Litigation Review responsive correspondence from K. Banner on behalf of Jomboy in furtherance of settlement discussions (.2); Correspondence with K. Everett and J. Hayes regarding same (.2).	450.00	0.40	180.00	Billable
8/11/2023 59017	Kim Fineman Litigation Telephone call to K. Everett regarding Jomboy analysis and next steps.	450.00	0.10	45.00	Billable
8/11/2023 59014	Kim Fineman Litigation Review and analyze financial information provided by Jomboy.	450.00	1.40	630.00	Billable
8/11/2023 59034	Jennifer Hayes Litigation Review and analysis of emails from K. Fineman re Jomboy shares valuation (.1); emails from and to K. Fineman re same (.1); telephone call with K. Fineman re same and re next steps (.2)	560.00	0.40	224.00	Billable
8/12/2023 59013	Kim Fineman Litigation Correspondence with K. Everett and J. Zagajeski regarding financial information provided by Jomboy and next steps.	450.00	1.00	450.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
8/14/2023 59019	Jennifer Hayes Litigation Review and analysis of emails from K. Fineman and K. Everertt re Jomboy valuation issues (.2)	560.00	0.20	112.00	Billable
8/23/2023 59216	Kim Fineman Litigation Follow up correspondence with K. Everett regarding Jomboy financials and settlement discussions.	450.00	0.60	270.00	Billable
8/28/2023 59297	Kim Fineman Litigation Correspondence with J. Hayes regarding status of Jomboy discussions.	450.00	0.10	45.00	Billable
8/28/2023 59220	Jennifer Hayes Litigation Review and analysis of emails from K. Everett and K. Fineman re Jomboy valuation issues (.2); emails to and from K. Fineman re tolling agreement (.1)	560.00	0.30	168.00	Billable
Total: Litigation			34.40		\$16,987.00
<u>Activity: Mediation</u>					
9/13/2022 52929	Jennifer Hayes Mediation Follow up email to B. Reed re MHC's decision with respect to mediation (.1); review and respond to email from B. Reed re same (.1)	560.00	0.20	112.00	Billable
9/23/2022 53198	Jennifer Hayes Mediation Follow up email to B. Reed re status of MHC's selection of BDRP mediator (.1); review and respond to email from B. Reed re same (.1); telephone call with B. Reed re same (.1); email to K. Everett re MHC mediation and next steps re same (.5); emails from and to K. Everett re scheduling a call to discuss mediation and analysis re same (.1); telephone call with K. Everett re same (.1)	560.00	1.00	560.00	Billable
9/27/2022 53197	Jennifer Hayes Mediation Follow up emails to and from B. Reed re status of BDRP mediator selection and scheduling (.1); email to K. Everett and J. Jagajeski re same (.1)	560.00	0.20	112.00	Billable
9/28/2022 53239	Jennifer Hayes Mediation Review and respond to email from B. Reed re MHC mediation and email to K. Everett re same (.1); further emails from and to B. Reed and K. Everett re same (1.)	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
9/29/2022 53253	Jennifer Hayes Mediation Emails to and from K. Everett re mediation dates (.1); email to B. Reed re same (.1)	560.00	0.20	112.00	Billable
10/3/2022 53473	Jennifer Hayes Mediation Email to B. Reed re status of mediation scheduling and BDRP stipulation (.1)	560.00	0.10	56.00	Billable
10/4/2022 53470	Jennifer Hayes Mediation Follow up email to B. Reed re mediation scheduling (.1); review and analysis of B. Reed's response (.1); emails to and from K. Everett re same (.1); further email to B. Reed re same (.1); review and respond to email from B. Reed re same and email to K. Everett re same (.1); draft stipulation for entry of order re BDRP (.4); email to B. Reed re same (.1)	560.00	1.00	560.00	Billable
10/5/2022 53457	Jennifer Hayes Mediation Review and respond to email from B. Reed re BDRP stipulation and mediation date (.1); further emails from and to B. Reed re same and email to K. Everett re same (.1); review and respond to email from K. Everett re same (.1); draft order re BDRP stipulation (.2); finalize and file stipulation and upload order (n/c)	560.00	0.50	280.00	Billable
10/6/2022 53586	Jennifer Hayes Mediation Follow up email to B. Reed re status of mediation scheduling (.1); emails from and to B. Reed and G. Kalikman re same (.1); emails to and from K. Everett re same (.1); review BDRP order and email to G. Kalikman re same (.1)	560.00	0.40	224.00	Billable
10/10/2022 53526	Jennifer Hayes Mediation Review email from G. Kalikman re mediation start time and email to K. Everett re same (.1); review and respond to email from K. Everett re same (.1); emails from and to G. Kalikman and B. Reed re same (.1); further emails to and from K. Everett re mediation (.1); email to G. Kalikman and B. Reed re same (.1)	560.00	0.50	280.00	Billable
10/18/2022 53708	Jennifer Hayes Mediation Review and analysis of email from G. Kalikman re change in mediation date (.1); emails from and to G. Kalikman and B. Reed re same (.1); emails to and from K. Everett re same (.1); further email to G. Kalikman and B. Reed re same (.1)	560.00	0.40	224.00	Billable
10/24/2022 53824	Jennifer Hayes Mediation Follow up email to B. Reed re mediation date (.1)	560.00	0.10	56.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
10/25/2022 53889	Jennifer Hayes Mediation Review email from B. Reed and review calendar re proposed revised mediation date (.1); emails to and from K. Everett re same (.1); further email to B. Reed and G. Kalikman re same (.1); further emails re rescheduling of the mediation (.1)	560.00	0.40	224.00	Billable
10/26/2022 53875	Jennifer Hayes Mediation Email to K. Everett re post-Thanksgiving mediation scheduling (.1)	560.00	0.10	56.00	Billable
10/31/2022 53971	Jennifer Hayes Mediation Follow up email to B. Reed re mediation scheduling (.1)	560.00	0.10	56.00	Billable
11/1/2022 54034	Jennifer Hayes Mediation Emails from and to B. Reed regarding mediation scheduling (.1); review and respond to email from B. Reed re same and evaluate proposed dates (.1); emails to and from K. Everett re same (.1); further emails to and from K. Everett re same (.1); emails from and to B. Reed re same; emails to and from G. Kalikman and then K. Everett re same (.1); further communications re mediation and mediation scheduling (.1)	560.00	0.70	392.00	Billable
11/14/2022 54276	Jennifer Hayes Mediation Review and respond to email from G. Kalikman re mediation agreement (.1); review and sign same (.1); emails to and from K. Everett re same (.1)	560.00	0.30	168.00	Billable
1/6/2023 55308	Jennifer Hayes Mediation Telephone call with S. Finestone re mediation statement (.1); begin revisions to same (.4)	560.00	0.50	280.00	Billable
1/8/2023 55311	Jennifer Hayes Mediation Continue reviewing and revising mediation brief for MHC mediation (2.3); emails to and from S. Finestone re same (.1); further revisions to same (.3)	560.00	2.70	1,512.00	Billable
1/8/2023 55283	S. Finestone Mediation Review draft mediation statement and emails with J. Hayes re same.	560.00	1.30	728.00	Billable
1/9/2023 55374	Jennifer Hayes Mediation Review and revise mediation brief (.3); review and analysis of mediation brief due date and requirements (.1); further review and revise brief re same (.2); emails to and from K. Everett re same (.1)	560.00	0.70	392.00	Billable
1/11/2023 55401	Jennifer Hayes Mediation Email to K. Everett re mediation brief (.1); review and respond to email from	560.00	2.80	1,568.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	K. Everett re same (.1); telephone call with K. Everett re same (.3); continue claims analysis for purposes of setoff aspect of mediation (1.1); review and revise mediation brief re same (.8)				
1/12/2023 55397	Jennifer Hayes Mediation Further analysis re estate's assets and liabilities, and estimated distribution to general unsecured creditors (.4); review and revise mediation brief re same (.3); email to K. Everett re same (.1); further review and analysis re mediation brief and estimated distribution issue (.3); emails from and to K. Everett re same (.1)	560.00	1.20	672.00	Billable
1/13/2023 55490	Jennifer Hayes Mediation Telephone call with S. Finestone re MHC mediation brief (.1); communications with K. Everett re same (.1); review, revise, and finalize same (.4); email to G. Kalikman re same (.1); email to MHC's counsel re same (.1); review and respond to email from MHC's counsel re same and re MHC's mediation statement and pre-mediation call (.1)	560.00	0.90	504.00	Billable
1/16/2023 55551	Jennifer Hayes Mediation Emails from and to B. Reed re mediation statement and scheduling a call to discuss same (.1); prepare for call with B. Reed and G. Gerstner (.2); telephone call with B. Reed and G. Gerstner re setoff issue and issues re calculation of same (.3)	560.00	0.60	336.00	Billable
1/17/2023 55519	Jennifer Hayes Mediation Analysis of pre-mediation issues raised by MHC (.3); email to K. Everett re same (.2); email to S. Finestone re analysis of "return to creditors" issue, in preparation for the mediation (.2); begin analysis re SEC and shareholder claims issues (.3); emails from and to S. Finestone re same (.1); legal research and analysis re investor and SEC claims (1.3)	560.00	2.40	1,344.00	Billable
1/18/2023 55549	Jennifer Hayes Mediation Further legal research re investor claims	560.00	1.60	896.00	Billable
1/19/2023 55569	Jennifer Hayes Mediation Further preparation for mediation and analysis re claims issues (1.0); communications with K. Everett re mediation (.1); emails to and from G. Kalikman re same (.1); telephone call with K. Everett re mediation (.1)	560.00	1.30	728.00	Billable
1/19/2023 55583	S. Finestone Mediation Emails with JCH re SEC position and treatment of investor claims/SEC claim	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
1/20/2023 55615	Jennifer Hayes Mediation Final preparation for mediation (.6); participate in mediation (7.5 -8:30am-4pm); telephone call with S. Finestone re same (.2)	560.00	8.30	4,648.00	Billable
1/20/2023 55582	S. Finestone Mediation Discussions with J. Hayes re mediation with MHC	560.00	0.30	168.00	Billable
1/25/2023 55674	Jennifer Hayes Mediation Emails from and to G. Gerstner re scheduling call to present and discuss MHC's settlement offer (.2); email to K. Everett re same (.1); further emails from and to Gerstner and K. Everett re same (.1)	560.00	0.40	224.00	Billable
1/26/2023 55721	Jennifer Hayes Mediation Review and analysis of settlement offer (.3); email to K. Everett re same (.1); telephone call with G. Gerstner and B. Reed re same (.2); emails to and from L. Parada re continuance of status conference (.1); follow up email to K. Everett regarding scheduling a time to discuss MHC's settlement offer and analysis (.1)	560.00	0.80	448.00	Billable
4/25/2023 57172	Jennifer Hayes Mediation Review and respond to email from B. Reed re joint status conference statement (.1); finalize and file same (.1); email to K. Everett re MHC's request for preliminary tax analysis (.1); email to Chambers re status conference statement (.1)	560.00	0.40	224.00	Billable
4/27/2023 57314	Jennifer Hayes Mediation Emails from and to Chambers re continuance of MHC status conference (.1); emails to and from S. Finestone re same and emails to and from K. Everett re same (.1)	560.00	0.20	112.00	Billable
Total: Mediation			33.20		\$18,592.00
<u>Activity: Motion</u>					
8/8/2023 59263	Ryan Witthans Motion Phone call with J. Hayes re settlement with MHC; review and organize service parties; communicate with service provider re same; draft certificate of service for NEF recipients (0.6).	385.00	0.60	231.00	Billable
8/14/2023 59302	Ryan Witthans Motion Review errata to motion to approve settlement with MHC; emails with J. Hayes re same; review and organize service parties; communicate with service provider re same; draft certificate of service for NEF recipients (0.4).	385.00	0.40	154.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
8/15/2023 59308	Ryan Witthans Motion Follow-up emails with service provider and J. Hayes re errata to motion to approve settlement with MHC (0.1).	385.00	0.10	38.50	Billable
Total: Motion			1.10		\$423.50
<u>Activity: Motion - MHC</u>					
8/3/2023 58861	Jennifer Hayes Motion - MHC Review and revise MHC 9019 motion (.6); email to G. Gerstner and B. Reed re same (.1); email to K. Everett re same (.1); draft Everett declaration in support of 9019 motion (.9); email to K. Everett re same (.1)	560.00	1.80	1,008.00	Billable
8/4/2023 58898	Jennifer Hayes Motion - MHC Communications with K. Everett re his declaration in support of MHC 9019 motion (.1); telephone call with K. Everett re same (.1); review and respond to email from G. Gerstner re 9019 motion and email to K. Everett re same (.1)	560.00	0.30	168.00	Billable
8/7/2023 58909	Jennifer Hayes Motion - MHC Telephone call with K. Everett re edits to his declaration (.1); revise and finalize same (.1); draft notice of hearing re MHC 9019 motion (.7)	560.00	0.90	504.00	Billable
8/8/2023 58934	Jennifer Hayes Motion - MHC Review proofs of service re 9019 motion (.1); email to G. Kalikman re 9019 motion and settlement (.1)	560.00	0.20	112.00	Billable
8/11/2023 59006	Jennifer Hayes Motion - MHC Review and analysis of spreadsheet for Busey re MHC 9019 motion (.1); telephone call with G. Gerstner re same (.1); draft errata to 9019 motion (.3); review and revise same (.1); email to K. Everett re same (.1); email to G. Gerstner re same (.1); further telephone call with G. Gerstner re same and re supplemental declaration (.1); draft, revise, and revise supplemental declaration (.7); email to K. Everett re same (.1); review and analysis of email from G. Gerstner re errata (.1); review and revise supplemental declaration (.2); email errata and supplemental declaration to K. Everett for review and comments (.1)	560.00	2.00	1,120.00	Billable
8/14/2023 59029	Jennifer Hayes Motion - MHC Review and respond to email from K. Everett re errata and supplemental declaration (.1); email to G. Gerstner re spreadsheet (.1); review and finalize errata and supplemental declaration (.2); emails to and from K. Everett re same (.1); email to R. Witthans re service issues (.1)	560.00	0.50	280.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
8/23/2023 59196	Jennifer Hayes Motion - MHC Review emails from J. Switzer and S. Finestone re MHC 9019 order (.1)	560.00	0.10	56.00	Billable
8/28/2023 59251	Jennifer Hayes Motion - MHC Draft declaration in support of request for entry of order by default (.3); draft request for entry of order by default (.2); draft order approving the MHC 9019 motion (.3); email to J. Switzer re same (.1); review and respond to email from J. Switzer re same (.1); draft proof of service re request for entry of order by default (.1)	560.00	1.10	616.00	Billable
8/30/2023 59400	Jennifer Hayes Motion - MHC Review and finalize request for entry of order by default and declaration (.1); update certificate of service (.1); file/upload REO, declaration, POS, and order (.1, n/c); review signed order and email to MHC's counsel re same (.1); email to K. Everett re same (.1); emails from and to K. Everett re Busey reservation of rights (.1)	560.00	0.50	280.00	Billable
Total: Motion - MHC			7.40		\$4,144.00
<u>Activity: Motion 4</u>					
1/16/2023 55543	Jennifer Hayes Motion 4 Emails to and from S. Finestone re 9019 motion re Peters settlement (.1); begin drafting 9019 motion (.3);	560.00	0.40	224.00	Billable
2/1/2023 55904	Jennifer Hayes Motion 4 Draft 9019 motion (.9); email to S. Finestone re same (.1)	560.00	1.00	560.00	Billable
2/1/2023 55884	S. Finestone Motion 4 Edits to 9019 motion for Peters adv. proceeding	560.00	0.60	336.00	Billable
2/2/2023 55907	Jennifer Hayes Motion 4 Emails from and to S. Finestone re 9019 motion (.1); review and revise same (.1); draft declaration in support of compromise motion (.4)	560.00	0.60	336.00	Billable
2/3/2023 55984	Jennifer Hayes Motion 4 Review and revise motion and declaration (.4); emails to and from K. Everett re same (.1); draft, review, and revise notice and opportunity for hearing (.8)	560.00	1.30	728.00	Billable
2/28/2023 56403	Jennifer Hayes Motion 4 Draft request for entry of order by default and supporting declaration re Peters compromise (.2); draft, review and revise order approving same (.2);	560.00	0.70	392.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	file REO and declaration, and upload order (.1, no charge); review and analysis of signed order approving settlement and payments due pursuant to same (.1); email to K. Everett re same (.1); email to M. St. James re same (.1); further email to K. Everett re calendar invitations for payment due dates (.1, n/c)				
6/26/2023 58169	Jennifer Hayes Motion 4 Begin drafting motion to approve compromise with MHC (1.3)	560.00	1.30	728.00	Billable
6/27/2023 58207	Jennifer Hayes Motion 4 Review and revise 9019 motion re MHC settlement (1.3)	560.00	1.30	728.00	Billable
Total: Motion 4			7.20		\$4,032.00
<u>Activity: Settlement</u>					
11/4/2022 54172	Jennifer Hayes Settlement Emails from and to R. Withans re call from Weiner's attorney (.1)	560.00	0.10	56.00	Billable
11/16/2022 54385	Jennifer Hayes Settlement Review emails from S. Finestone and K. Everett re current draft of Peters settlement agreement and next steps re same (.1)	560.00	0.10	56.00	Billable
1/10/2023 55382	Jennifer Hayes Settlement Review emails from S. Finestone and K. Everett re Peters settlement agreement (.1)	560.00	0.10	56.00	Billable
1/27/2023 55703	Jennifer Hayes Settlement Emails to and from K. Everett regarding scheduling of today's call to discuss MHC settlement offer (.1); review and analysis of MHC's settlement offer (.6); emails to and from S. Finestone re same (.1); telephone call with S. Finestone re same (.3); further analysis re settlement offer (.4); telephone call with K. Everett re same (.6); notes to file re same (.2);	560.00	2.30	1,288.00	Billable
1/31/2023 55872	Jennifer Hayes Settlement Review and respond to email from S. Finestone re executed Peters settlement agreement (.1); further emails from and to S. Finestone and K. Everett re same (.1)	560.00	0.20	112.00	Billable
2/6/2023 55979	Jennifer Hayes Settlement Email to K. Everett re MHC's settlement offer and developing a response to same (.1); review and respond to email from K. Everett (.1); email to MHC's counsel re status (.1)	560.00	0.30	168.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
2/7/2023 55986	Jennifer Hayes Settlement Emails from and to G. Kalikman regarding ongoing mediation and scheduling a call re same (.1); telephone call with G. Kalikman re offer and status of counteroffer and notes to file re same (.8, bill for .5); draft counteroffer to MHC and email to K. Everett re same (1.2); review and respond to email from K. Everett re same (.1); email to MHC's counsel requesting to share settlement spreadsheet with estate's two largest creditors (.2); emails to and from S. Finestone re contact information for estate's largest creditors (.1)	560.00	2.20	1,232.00	Billable
2/8/2023 56039	Jennifer Hayes Settlement Review and respond to email from G. Gerstner regarding request to share settlement spreadsheet with estate's two largest creditors (.1); analysis re same and email to K. Everett re same (.1)	560.00	0.20	112.00	Billable
2/10/2023 56091	Jennifer Hayes Settlement Review and respond to email from B. Reed re scheduling a call to discuss request to share settlement offer details with estate's largest creditors (.1); review and respond to further email from B. Reed re same (.1)	560.00	0.20	112.00	Billable
2/13/2023 56142	Jennifer Hayes Settlement Review and analysis of draft email to K. Everett re Weiner settlement offer and next steps (.1); emails from and to R. Witthans re same (.1); further analysis re counteroffer terms and further emails from and to R. Witthans re same (.2); telephone call with R. Witthans re same (.2)	560.00	0.60	336.00	Billable
3/9/2023 56441	Jennifer Hayes Settlement Emails from and to K. Everett and R. Witthans re scheduling a call to discuss D.Weiner settlement offer (.1)	560.00	0.10	56.00	Billable
3/17/2023 56609	Jennifer Hayes Settlement Analysis re Weiner settlement terms and telephone call with K. Everett and R. Witthans re same (.6)	560.00	0.60	336.00	Billable
3/19/2023 56634	Jennifer Hayes Settlement Review and respond to email from R. Witthans re terms of Weiner settlement (.1)	560.00	0.10	56.00	Billable
3/30/2023 56818	Jennifer Hayes Settlement Review and analysis of Weiner's counteroffer (.2); emails from and to R. Witthans re same (.2); fact research re investor contributions in 2022 (.2); review and analysis of same and communications with J. Zagajeski and R. Witthans re same (.2)	560.00	0.80	448.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
4/7/2023 56971	Jennifer Hayes Settlement Email to K. Everett re tax analysis for MHC settlement (.1); review and analysis of Weiner settlement counteroffer and telephone call with R. Witthans re same (.2)	560.00	0.30	168.00	Billable
4/10/2023 56967	Jennifer Hayes Settlement Conversation with R. Witthans re status of Weiner settlement discussions	560.00	0.10	56.00	Billable
4/12/2023 57022	Jennifer Hayes Settlement Review and revise draft Weiner settlement agreement and consent judgment (.3); emails from and to R. Witthans re same (.1)	560.00	0.40	224.00	Billable
4/13/2023 57025	Jennifer Hayes Settlement Review and analysis of counteroffer to D. Weiner and review and revise same (.3); emails from and to R. Witthans re same (.1)	560.00	0.40	224.00	Billable
4/27/2023 57313	Jennifer Hayes Settlement Analysis re Weiner AP strategy (.1); telephone calls with R. Witthans re same (.2)	560.00	0.30	168.00	Billable
4/28/2023 57281	Jennifer Hayes Settlement Review emails from R. Witthans and K. Everett re Weiner settlement (.1)	560.00	0.10	56.00	Billable
5/1/2023 57430	Ryan Witthans Settlement Follow-up emails with D. Weiner re settlement payment timing and tracking (0.1).	385.00	0.10	38.50	Billable
5/4/2023 57445	Ryan Witthans Settlement Emails with D. Weiner and trustee re status of settlement payment (0.1).	385.00	0.10	38.50	Billable
5/15/2023 57709	Ryan Witthans Settlement Emails with D. Weiner and trustee re confirmation of receipt of settlement payment (0.1).	385.00	0.10	38.50	Billable
5/18/2023 57637	Jennifer Hayes Settlement Analysis of MHC settlement offer and counteroffer (.9); telephone call with K. Everett re same (.1)	560.00	1.00	560.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/19/2023 57596	Jennifer Hayes Settlement Legal research related to MHC settlement issues (.3); further analysis re and calculation of counteroffer (.9); email to K. Everett re same (.2)	560.00	1.40	784.00	Billable
5/22/2023 57720	Ryan Witthans Settlement Legal research and drafting re motion to approve compromise with D. Weiner (1.7).	385.00	1.70	654.50	Billable
5/23/2023 57648	Ryan Witthans Settlement Legal research and drafting re motion to approve compromise with D. Weiner; emails with D. Weiner re same (0.5).	385.00	0.50	192.50	Billable
5/23/2023 57695	Jennifer Hayes Settlement Email to G. Gerstner and B. Reed re today's scheduled call (.1); email to K. Everett re MHC settlement counteroffer analysis (.1); emails from and to J. Zagajeski re same (.1)	560.00	0.30	168.00	Billable
5/24/2023 57651	Ryan Witthans Settlement Legal research and drafting re motion to approve compromise with D. Weiner (3.1).	385.00	3.10	1,193.50	Billable
5/25/2023 57723	Ryan Witthans Settlement Drafting and revisions to motion to approve compromise with D. Weiner and trustee's supporting declaration; emails with trustee re same (0.3).	385.00	0.30	115.50	Billable
5/26/2023 57738	Jennifer Hayes Settlement Telephone call with K. Everett re Jomboy settlement offer (.1); further analysis re same (.2); telephone call with K. Fineman re same (.1)	560.00	0.40	224.00	Billable
5/30/2023 57656	Ryan Witthans Settlement Emails with trustee re draft motion to approve compromise with D. Weiner and supporting declaration (0.1). Revise and finalize motion and supporting papers; draft notice and opportunity for hearing (1.5).	385.00	1.60	616.00	Billable
5/30/2023 57638	Jennifer Hayes Settlement Review email from J. Switzer and email to K. Everett re same (.1)	560.00	0.10	56.00	Billable
5/31/2023 57726	Ryan Witthans Settlement Emails with trustee and D. Weiner re status of settlement approval; emails with J. Hayes and service provider re mail service; draft certificate of service re electronic service (0.4). Draft proposed order, request for entry of order, and supporting papers (0.2).	385.00	0.60	231.00	Billable



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
5/31/2023 57669	Jennifer Hayes Settlement Follow up email to K. Everett re MHC counteroffer (.2)	560.00	0.20	112.00	Billable
6/1/2023 57867	Jennifer Hayes Settlement Email to K. Everett re MHC settlement offer (.1)	560.00	0.10	56.00	Billable
6/2/2023 57859	Jennifer Hayes Settlement Prepare for call with Trustee re MHC settlement counteroffer (.3); telephone call with K. Everett re same (.5)	560.00	0.80	448.00	Billable
6/5/2023 57978	Ryan Witthans Settlement Draft proposed order, request for entry of order, and supporting papers; draft stipulation and order voluntarily dismissing adversary proceeding (1.8).	385.00	1.80	693.00	Billable
6/12/2023 57926	Jennifer Hayes Settlement Review and respond to email from B. Reed re scheduling call to discuss settlement counteroffer (.1)	560.00	0.10	56.00	Billable
6/13/2023 57944	Jennifer Hayes Settlement Email to B. Reed re today's call to discuss Trustee's settlement counteroffer and communications with S. Finestone re MHC litigation status (.1); telephone call with B. Reed and G. Gerstner re settlement (.2); telephone call with K. Everett re same (.1); draft settlement agreement (1.3); draft 9019 motin (1.9)	560.00	3.60	2,016.00	Billable
6/14/2023 57948	Jennifer Hayes Settlement Continue to review and revise settlement agreement (1.7); email to K. Everett re same (.1); telephone call with MHC's attorneys re same (.1); review and respond to email from K. Everett re draft of settlement agreement (.1); email to MHC's lawyers re same (.1)	560.00	2.10	1,176.00	Billable
6/19/2023 58099	Ryan Witthans Settlement Revise request for entry of default order re settlement with D. Weiner, proposed order, and stipulation and order dismissing adversary proceeding; emails with trustee re same (0.3).	385.00	0.30	115.50	Billable
6/19/2023 58062	Jennifer Hayes Settlement Follow up email to G. Gerstner and B. Reed re settlement agreement (.1); email to M. St. James re settlement payment due on 6/30 from Mr. Peters (.1); emails to K. Everett re status of MHC settlement agreement and re Peters settlement payment (.1); review and respond to email from B. Reed re settlement agreement status (.1)	560.00	0.40	224.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/20/2023 58113	Ryan Witthans Settlement Phone call with J. Hayes re request for entry of default order and related papers; follow-up email to client re same (0.1).	385.00	0.10	38.50	Billable
6/21/2023 58118	Ryan Witthans Settlement Revise and finalize request for entry of default order approving compromise with D. Weiner; emails with trustee re same (0.3). Revise and finalize stipulation dismissing adversary proceeding; emails with D. Weiner re same (0.3). Follow-up emails with D. Weiner and trustee re same (0.1).	385.00	0.70	269.50	Billable
6/22/2023 58102	Ryan Witthans Settlement Draft emails to trustee and D. Weiner re court's approval of settlement agreement; update stipulation and proposed order dismissing related adversary proceeding (0.3).	385.00	0.30	115.50	Billable
6/22/2023 58078	Jennifer Hayes Settlement Telephone call with B. Reed re MHC's edits to settlement agreement (.1); review and analysis of same (.6); further telephone call with B. Reed re same and notes to file re same (.2)	560.00	0.90	504.00	Billable
6/23/2023 58129	Jennifer Hayes Settlement Review and revise settlement agreement draft received from B. Reed (.6); email to B. Reed re same (.1)	560.00	0.70	392.00	Billable
6/27/2023 58244	Ryan Witthans Settlement Emails with trustee and D. Weiner confirming approval of settlement agreement and dismissal of adversary proceeding (0.1).	385.00	0.10	38.50	Billable
6/27/2023 58191	Jennifer Hayes Settlement Follow up email to B. Reed re status of revisions to MHC settlement agreement (.1); review and analysis of Peters settlement agreement (.1); draft response to T. Peters request for payment deadline extension and email to K. Everett re same (.2); emails from and to B. Reed and K. Everett re MHC settlement agreement and re Peters settlement payment (.1); email to T. Peters re settlement payment and Trustee's rejection of his request for extension (.1); review and respond to further email from T. Peters re same (.1)	560.00	0.70	392.00	Billable
7/10/2023 58387	Jennifer Hayes Settlement Email to B. Reed re status of MHC's revisions to 6/23 settlement agreement draft (.1); email to K. Everett re same (.1)	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
7/11/2023 58429	Jennifer Hayes Settlement Further follow up email to B. Reed and G. Gerstner re status of MHC's revisions to settlement agreement (.1); follow up email to K. Everett re same (.1); further emails from and to B. Reed and K. Everett re same (.1)	560.00	0.30	168.00	Billable
7/12/2023 58405	Jennifer Hayes Settlement Further follow up email to G. Gerstner and B. Reed re status of MHC's revisions to settlement agreement draft circulated on 6/23 (.1); review and respond to email from B. Reed re same and email to K. Everett to update him re status (.1)	560.00	0.20	112.00	Billable
7/13/2023 58454	Jennifer Hayes Settlement Review email from T. Peters re settlement payment default (.1); email notice of payment default to M. St. James and T. Peters (.2); email to K. Everett re same (.1); review and respond to email from K. Everett re same (.1)	560.00	0.50	280.00	Billable
7/14/2023 58453	Jennifer Hayes Settlement Follow up email to B. Reed and G. Gerstner re settlement agreement revision status (.2); telephone call with B. Reed re same and emails from and to R. Witthans re same (.1)	560.00	0.30	168.00	Billable
7/18/2023 58530	Jennifer Hayes Settlement Further follow up email to MHC's counsel re status of response to 6/23 settlement agreement draft (.1); email to K. Everett re same (.1); further emails from and to G. Gerstner, K. Everett, and S. Finestone re same (.1)	560.00	0.30	168.00	Billable
7/20/2023 58545	Jennifer Hayes Settlement Emails from and to G. Gerstner re MHC's revisions to draft settlement agreement (.1); review and analysis of MHC's proposed revisions (.4); email to K. Everett re same (.1); detailed voicemail to G. Gerstner re sole remaining issue in settlement agreement and telephone call with B. Reed re same (.2); telephone call with K. Everett re same (.1); further review of and revisions to settlement agreement draft (.4); email to K. Everett re same (.1); email to G. Gerstner and B. Reed re further revised settlement agreement draft (.1); telephone call with G. Gerstner re revisions to current settlement agreement version (.1)	560.00	1.60	896.00	Billable
7/21/2023 58673	Jennifer Hayes Settlement Telephone call with K. Everett re settlement agreement status and anticipated execution copy (.1)	560.00	0.10	56.00	Billable
7/24/2023 58675	Jennifer Hayes Settlement Email to G. Gerstner re status of settlement agreement (.1); review and	560.00	1.00	560.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	respond to email from G. Gerstner re same (.1); review final draft of settlement agreement (.4); email execution copy of settlement agreement to G. Gerstner (.1); email to K. Everett re same (.1); emails to and from B. Reed re 7/28 status conference (.1); email to Chambers re same (.1)				
7/26/2023 58749	Jennifer Hayes Settlement Follow up emails to K. Everett re MHC settlement agreement and re Peters settlement payment (.1); review and respond to email from T. Peters re payment confirmation request (.1)	560.00	0.20	112.00	Billable
7/27/2023 58764	Jennifer Hayes Settlement Emails from and to T. Peters re settlement payment (.1); telephone call with K. Everett re same and re MHC settlement agreement (.1); emails from and to K. Everett re MHC settlement agreement (.1); review and analysis of execution copy of settlement agreement and sign same (.3); email to MHC's counsel re same (.1); follow up email to K. Everett re same (.1)	560.00	0.80	448.00	Billable
8/2/2023 58851	Jennifer Hayes Settlement Follow up email to MHC's counsel re status of execution of settlement agreement (.1)	560.00	0.10	56.00	Billable
8/3/2023 58866	Jennifer Hayes Settlement Emails from and to G. Gerstner re settlement agreement, 9019 motion, and estate's W-9 (.1); emails to K. Everett re same (.1)	560.00	0.20	112.00	Billable
Total: Settlement			39.50		\$20,125.00
<u>Activity: Tax</u>					
1/30/2023 55741	Jennifer Hayes Tax Email to B. Reed and G. Gerstner re MHC's settlement offer (.3); email to K. Everett re same (.1); review and respond to emails from K. Everett and B. Reed re same (.1)	560.00	0.50	280.00	Billable
2/6/2023 55956	Jennifer Hayes Tax Review and analysis of certificate of service (.1); file same (n/c)	560.00	0.10	56.00	Billable
2/13/2023 56145	Jennifer Hayes Tax Emails from and to B. Reed re scheduling call to discuss next steps with settlement offer (.1); further emails re same (.1)	560.00	0.20	112.00	Billable
2/14/2023 56173	Jennifer Hayes Tax Emails from and to B. Reed re rescheduling call to discuss counteroffer	560.00	0.60	336.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	issues (.1); prepare for call with counsel for MHC re settlement offer communications (.2); telephone call with B. Reed re same (.2); telephone call with K. Everett re same (.1)				
2/20/2023 56239	Jennifer Hayes Tax Review and respond to email from B. Reed regarding scheduling a call (.1); review settlement spreadsheet (.1); telephone call with B. Reed and G. Gerstner re same (.2); telephone call K. Everett re settlement (.1)	560.00	0.50	280.00	Billable
2/21/2023 56203	Jennifer Hayes Tax Email to K. Everett re 2/24 status conference and status of analysis of tax issue in settlement discussions (.1)	560.00	0.10	56.00	Billable
2/23/2023 56270	Jennifer Hayes Tax Review email from B. Reed re status of Trustee's response re tax issue and email to K. Everett re same and re 2/24 status conference (.1); telephone call with K. Everett re same (.1); email to B. Reed re same (.1); draft status conference statement (.3); emails to and from B. Reed re same (.1); revise status conference statement (.1); further emails to and from B. Reed re same (.1); further revisions to joint statement (.1); emails to L. Parada re status conference statements (.1)	560.00	1.10	616.00	Billable
2/24/2023 56285	Jennifer Hayes Tax Review and respond to email from B. Reed re scheduling a call to discuss tax issue (.1); further emails with B. Reed re same (.1); telephone call with B. Reed re next steps re tax analysis (.1); detailed voicemail to K. Everett re same (.1)	560.00	0.40	224.00	Billable
3/7/2023 56472	Jennifer Hayes Tax Review and respond to email from B. Reed re scheduling of call between Trustee and MHC's tax professional (.1); email to K. Everett re same (.1); review and respond to email from K. Everett re same and email to B. Reed re same (.1)	560.00	0.30	168.00	Billable
3/10/2023 56452	Jennifer Hayes Tax Review email from B. Reed re efforts to schedule meeting with tax accountant and telephone call with B. Reed re same (.1); email to B. Reed re same (.1); email to K. Everett re same (.1)	560.00	0.30	168.00	Billable
3/13/2023 56566	Jennifer Hayes Tax Email to K. Everett re scheduling call to discuss tax issues (.1); emails to and from B. Reed re same (.1)	560.00	0.20	112.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total Billable
3/14/2023 56578	Jennifer Hayes Tax Review and respond to email from B. Reed regarding 3/17 call re tax issues in settlement and scheduling global call to discuss same (.1); emails to and from K. Everett re same (.1); follow up emails to B. Reed and K. Everett re same (.1)	560.00	0.30	168.00	Billable
3/17/2023 56610	Jennifer Hayes Tax Prepare for Zoom with MHC and its professionals re tax issues re settlement (.3); Zoom with MHC and its professionals and K. Everett re same (.9); follow up call with K. Everett re same (.1)	560.00	1.30	728.00	Billable
3/29/2023 56830	Jennifer Hayes Tax Telephone call with S. Finestone re status of MHC settlement (.1); review notes from 3/17 Zoom with MHC to discuss tax issues (.1); email to K. Everett re list of tax issues and status of addressing same (.2); review and respond to email from K. Everett re same (.1); emails to and from B. Reed re same (.1); further emails to K. Everett and B. Reed re same (.1)	560.00	0.70	392.00	Billable
4/12/2023 57049	Jennifer Hayes Tax Telephone call with K. Everett re tax aspects of MHC settlement (.1); email to K. Everett re same (.1)	560.00	0.20	112.00	Billable
4/13/2023 57027	Jennifer Hayes Tax Email to K. Everett re status of tax analysis re MHC settlement (.1)	560.00	0.10	56.00	Billable
4/14/2023 57076	Jennifer Hayes Tax Follow up email to K. Everett re status of MHC tax analysis (.1)	560.00	0.10	56.00	Billable
4/18/2023 57120	Jennifer Hayes Tax Review and analysis of email from K. Everett re tax issues (.1); emails to and from S. Finestone re same (.1)	560.00	0.20	112.00	Billable
4/20/2023 57159	Jennifer Hayes Tax Review emails from S. Brown and K. Everett re analysis of tax issues (.1)	560.00	0.10	56.00	Billable
4/21/2023 57163	Jennifer Hayes Tax Review and analysis of tax attorney's response to estate's tax liability issues (.3); emails to and from S. Finestone re same (.1); emails from and to K. Everett re same (.1)	560.00	0.50	280.00	Billable
4/24/2023 57171	Jennifer Hayes Tax Telephone call with S. Finestone re status of tax analysis and 4/28 status	560.00	0.70	392.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
	conference (.1); draft joint status conference statement (.4); emails to and from K. Everett re same (.1); email to B. Reed re same (.1)				
4/25/2023 57177	Jennifer Hayes Tax Draft memo re tax issues for ongoing MHC mediation (.7); email to K. Everett re same (.1); review and respond to email from K. Everett re same (.1); further review of draft (.1); email to B. Reed re same (.1)	560.00	1.10	616.00	Billable
4/27/2023 57417	S. Finestone Tax Further emails re tax issues and creditor inquiry.	560.00	0.20	112.00	Billable
5/5/2023 57400	Jennifer Hayes Tax Prepare for call with MHC's counsel and tax professionals re estate's tax liabilities (.3); Zoom re same (.2); follow up call with K. Everett re same (.1); telephone call with S. Finestone re status of settlement discussions (.1); emails to K. Everett and MHC's attorneys re continued follow up meetings (.1)	560.00	0.80	448.00	Billable
5/8/2023 57462	Jennifer Hayes Tax Telephone call with R. Witthans re status of settlement payment and 9019 motion strategy (.1)	560.00	0.10	56.00	Billable
5/12/2023 57547	Jennifer Hayes Tax Emails from and to K. Everett regarding rescheduling call to discuss tax issues (.1)	560.00	0.10	56.00	Billable
5/15/2023 57514	Jennifer Hayes Tax Review and analysis of email from G. Gerstner re status of Trustee's tax analysis (.1); emails to and from K. Everett re same (.1)	560.00	0.20	112.00	Billable
5/16/2023 57700	Jennifer Hayes Tax Review and analysis re responding to G. Gerstner email re tax issues and email to G. Gerstner re same (.2); emails from and to G. Gerstner re same (.1); review and analysis of emails from S. Brown and K. Everett re tax issues (.1); telephone call with K. Everett re same (.1); email to G. Gerstner re same (.1)	560.00	0.60	336.00	Billable
6/5/2023 57861	Jennifer Hayes Tax Email to G. Gerstner and B. Reed re counteroffer and request to schedule call to discuss same (.1); review and analysis of counteroffer spreadsheet and email to J. Zagajeski re same (.2); draft settlement counteroffer email (.4); emails to and from K. Everett re same (.1); emails to and from B. Reed and G. Gerstner re same (.1)	560.00	0.90	504.00	Billable

Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Task	Rate Markup %	Hours DNB Time	Amount DNB Amt	Total
6/21/2023	Jennifer Hayes	560.00	0.10	56.00	Billable
58076	Tax				
	E-mails from and to B. Reed re scheduling a call to discuss draft settlement agreement (.1)				

Total: Tax			12.60		\$7,056.00
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TOTAL	Billable Fees		420.80		\$204,853.50
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Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
<u>Activity: FedEx</u>					
4/12/2023	Kim Fineman	48.91	2.000	97.82	Billable
57055	FedEx				
	FedEx - Letter re draft Jomboy Complaint				

Total: FedEx					\$97.82
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<u>Activity: Filing</u>					
10/15/2022	Jennifer Hayes	350.00	1.000	350.00	Billable
53637	Filing				
	Court Filing Fee-complaint filing fee				

Total: Filing					\$350.00
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<u>Activity: LEXIS</u>					
9/2/2022	S. Finestone	13.11	1.000	13.11	Billable
52647	LEXIS				
	Lexis online computer research				
10/1/2022	S. Finestone	180.41	1.000	180.41	Billable
53272	LEXIS				
	Lexis online computer research				
11/3/2022	S. Finestone	80.10	1.000	80.10	Billable
54010	LEXIS				
	Lexis online computer research				
12/7/2022	S. Finestone	1.58	1.000	1.58	Billable
54853	LEXIS				
	Lexis online computer research				
1/1/2023	S. Finestone	62.48	1.000	62.48	Billable
55177	LEXIS				
	Lexis online computer research				



Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
2/2/2023 55885	S. Finestone LEXIS Lexis online computer research	74.13	1.000	74.13	Billable
3/19/2023 56591	S. Finestone LEXIS Lexis online computer research	46.72	1.000	46.72	Billable
6/1/2023 57748	S. Finestone LEXIS Lexis online computer research	12.07	1.000	12.07	Billable
6/1/2023 57749	S. Finestone LEXIS Lexis online computer research	72.13	1.000	72.13	Billable
Total: LEXIS					\$542.73
<u>Activity: Photocopies</u>					
8/30/2022 52496	Jennifer Hayes Photocopies Copying cost- print lengthy time records for drafting first interim fee application	0.20	536.000	107.20	Billable
9/27/2022 53183	Jennifer Hayes Photocopies Copying cost-print research results re criminal restitution judgment	0.20	254.000	50.80	Billable
Total: Photocopies					\$158.00
<u>Activity: Postage</u>					
9/7/2022 52779	Kim Fineman Postage Postage - Follow-up letter to TD Bank regarding outstanding document subpoena.	0.60	1.000	0.60	Billable
9/26/2022 53195	Jennifer Hayes Postage Postage- service of notice of hearing on first interim fee application	247.40	1.000	247.40	Billable
10/17/2022 53695	Jennifer Hayes Postage Postage-serve summons, complaint, etc on D. Weiner	0.60	3.000	1.80	Billable
Total: Postage					\$249.80

9/5/2023  
5:16 PM

Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

Date ID	Timekeeper Expense	Price Markup %	Quantity	Amount	Total
<u>Activity: Service Fee</u>					
2/3/2023 56027	Ryan Witthans Service Fee Service of notice of fee application hearing.	127.07	1.000	127.07	Billable
2/6/2023 55962	Jennifer Hayes Service Fee Service Fee- Certificate of Service.com expense for serving Peters 9019 notice	145.41	1.000	145.41	Billable
5/30/2023 57657	Ryan Witthans Service Fee Service of notice and opportunity for hearing re motion to approve compromise re Weiner AP.	134.64	1.000	134.64	Billable
7/5/2023 58618	Ryan Witthans Service Fee Cost to serve notice and opportunity for hearing re motion to pay UnitedLex administrative expenses.	76.38	1.000	76.38	Billable
8/8/2023 59262	Ryan Witthans Service Fee Cost to serve notice of motion to approve compromise with MHC.	120.25	1.000	120.25	Billable
8/15/2023 59326	Ryan Witthans Service Fee Cost to serve errata to motion to approve settlement with MHC.	67.00	1.000	67.00	Billable
Total: Service Fee					\$670.75
TOTAL Billable Costs					\$2,069.10
				Amount	Total
Total of Fees (Time Charges)					\$204,853.50
Total of Costs (Expense Charges)					\$2,069.10
Total new charges					\$206,922.60
Accounts Receivables					
Date ID	Type	Description			
10/5/2022 4011	PAY	Payment - thank you. Check No. 1012		(\$321,341.37)	
Total Accounts Receivable					(\$321,341.37)

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Finestone Hayes LLP  
Pre-bill Worksheet

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Everett.Benja:Kyle Everett (continued)

	Amount	Total
Total New Balance		(\$114,418.77)

Timekeeper Summary

Timekeeper	Rate	Hours	Charges	Slip Value	Adjustment
JCH	560.00	194.40	\$108,864.00	\$108,864.00	0.00
JCH	545.00	0.10	\$54.50	\$54.50	0.00
JCL	385.00	44.10	\$16,978.50	\$16,978.50	0.00
KSF	450.00	62.30	\$28,035.00	\$28,035.00	0.00
RAW	385.00	92.70	\$35,689.50	\$35,689.50	0.00
SDF	560.00	27.20	\$15,232.00	\$15,232.00	0.00